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First name: Karen

Last name: Yarnell

Organization: Sierra Club

Title: Chair, Wildlands & Wilderness Team

Comments: Regarding the FSM 2355 Climbing Opportunities #ORMS-3524 Project, Sierra Club supports staying true to established policy and law on minimum activity (method and tool) use in Wilderness. Sierra Club Policy on Fixed Anchors in Wilderness states: "The use of power drills is prohibited in wilderness areas. Any alteration of rock should be prohibited, except as minimally necessary for the placement of fixed anchors."

Sierra Club Policy further recognizes that "Climbing, including the use of fixed anchors, is an historic and can be an appropriate use of wilderness, consistent with the purposes of the Wilderness Act." "(Fixed anchors) should be regulated as installations in wilderness; their use in wilderness may be authorized under Section 4(c) of the Wilderness Act, which provides that installations can be allowed where 'necessary to meet minimum requirements for the administration of the area for the purpose of this Act.' Within designated wilderness areas, or areas otherwise protected for their wilderness values, climbing, including the use of fixed anchors, should be subject to the same standards as all other activities that are consistent with the preservation of the wilderness character of these lands." Sierra Club policy further states, "Site-specific wilderness management plans should include certain minimum requirements for climbing. Climbing should not occur where fragile, rare, threatened, or endangered plant or animal species may be impacted, where human presence may interfere with essential wildlife behavioral patterns, where recreational activities may interfere with religious or cultural values, or where it would compromise the scenic resource. Fixed anchors should not be used where there is a removable equipment alternative."

The Sierra Club supports a ban on power tool use in Wilderness, including power drills to install fixed anchors in rock. We agree with the following statement in the Proposed FSM 2355 Climbing Directives.

7. Prohibit use of motorized rock drills and practices such as chipping and use of glue, epoxy, or other fixatives for hand holds and foot holds in climbing management plans for climbing opportunities in wilderness.

Power drills will negatively impact the solitude value and undeveloped quality of Wilderness and interfere with the experience of other park users. Native American Nations and peoples should be consulted on fixed anchor policy in wilderness. Recreational climbing should not take precedence over protecting natural or historic features and native plant and animal life in wilderness. The US Forest Service should use the minimum tool analysis that is firmly established in US law and policy.

Sierra Club Policy on Fixed Anchors in Wilderness

<https://www.sierraclub.org/policy/wilderness-management/fixed-anchors-wilderness>

Adopted by the Board of Directors, May 9-10, 1998; amended November 17, 2000.