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Comments: Comments on FSM 2355 Climbing Opportunities #ORMS-3524

I have climbed on Federal land for more than 15 years all across the country. The proposed Draft FSM 2355 Climbing Opportunities #ORMS-3524("Draft") severely compromises safety, restricts recreational opportunities in contravention of the Wilderness Act's purposes, and misunderstands the extremely limited impacts of fixed anchors in Wilderness. I urge USFS to reject this Draft. I also support the specific positions of the Access Fund and other similar organizations that provide more detailed comments and join them in their comments. However, I provide the following points for consideration.

Climbing is perhaps the sport that most fulfills the Wilderness Act's goal of promoting opportunities for a "primitive and unconfined type of recreation." (See Wilderness Act § 2(c)(2).) Few other pursuits combine self-reliance, solitude (perhaps with one or two partners), interaction with the "geological... features of... scenic... value" (id. § 2(c)(4)), and true freedom that comes with climbing. I personally spend several weeks every summer climbing in Wilderness Areas, primarily in the Western United States. Those are the time where I feel most connected to the natural environment and most appreciative of the public lands that our country has chosen to project.

Climbing requires fixed anchors for safety. Even routes that can be completely protected by removable gear still can require fixed anchors for descent or retreat. And first ascents can require fixed anchors to descend from dead-ends and impassible sections. There is no separating the use of fixed anchors from climbing-they go together.

The Draft defines bolts as "installations" under the Act and requires a Minimum Requirements Analysis ("MRA"). And yet fixed anchors do not neatly fit into the Act's prohibition: the Draft's conclusion that bolts are "installations" under the Act is not compelled by the Act's language and contravenes its purposes and history.

Recommended Change: The Draft should be changed to conclude that fixed anchors are not "installations" for the purpose of the Act and that existing management rules (i.e. the prohibition on motorized drills, restrictions on disturbing nesting raptors and archaeological and sacred sites) are sufficient.

The Draft places unacceptable restrictions on the replacement of existing anchors. (Draft, p. 4.) Park managers are directed to "evaluate" existing routes in their park before permitting replacement of existing anchors. This evaluation has no timeline and no source of funding is identified. For existing routes that have not been "evaluated," preexisting fixed anchors (including slings) can only be replaced without a cumbersome permit application if the replacement is 1) in an emergency; 2) if necessary to exit the climb in 3) the safest and 4) most expeditious manner possible. Replacement of lead bolts (or fixed pins, or threads, or any other fixed anchor) is not permitted without a permit under non-emergency conditions, or when you're not "exiting" a route, or if you are "exiting" a route under emergency conditions, if it's not done in the "safest" and "most expeditious" manner possible-an evaluation that could be made long after the fact by non-climbers.

This level of restriction for anchor replacement will lead to unacceptable levels of danger. Replacement of fixed anchors is a community responsibility and they require constant upkeep. Fixed slings-a common feature on remote routes where bolts are rare-degrade quickly in the sun and are chewed by rodents. Most responsible wilderness climbers carry a small knife and extra material to quickly and safely maintain these life-critical resources. But such good deeds would be prohibited without an MRA under the Draft. Several climbers have

died in the last few years due to compromised slings-an outcome that a ban on replacing them would only exacerbate.

Recommended Change: Climbers should retain the discretion to replace existing anchors as needed. USFS may continue to evaluate routes and close them only if the routes result in unacceptable risks to other park users or damage to natural resources.

The Draft notes that bolt-intensive climbs "concentrate[] human activity," in contradiction to Wilderness values. (Draft at p. 16) But controlling bolts (or other fixed anchors) is a poor proxy for managing visitation. I generally support efforts to reduce environmental impacts from overuse. However, to control visitation, fixed anchor restrictions are both underinclusive and overinclusive. There are many popular climbs that involve no fixed anchors; thus this rule would do nothing to address the impacts of concentrated human activity in those areas. But the Draft is over-restrictive to all routes that use fixed gear, whether they're popular or not. If USFS want to restrict visitation, they have tools to do that: reservations, quotas, tiny parking lots and tow trucks. For instance, the quota system in Yosemite and SEKI, in concert with Inyo NF, is extremely effective at preserving solitary wilderness experiences despite those parks' proximity to major population centers. These quotas keep crowds down far more effectively than restricting fixed anchors would.

Recommended Action: carefully review the Draft for instances where USFS is assuming that restricting bolts and/or fixed anchors will reduce visitation. Evaluate whether the assumption holds true or whether other tools-quotas, timed entry reservations, parking restrictions, etc., could better achieve a goal of limiting visitation (if that is even an appropriate goal).

The Draft states that a Climbing Management Plan should "Restrict the placement and replacement of fixed anchors and fixed equipment to established climbing opportunities...." (Draft at p. 13.) This restriction is antithetical to the long history of exploratory climbing on Forest land. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless climbing must be restricted to protect cultural and natural resources.

I believe that the Draft has serious flaws that require careful evaluation. I urge USFS to significantly revise or reject this Draft altogether.

Sincerely,

Erica Maharg