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First name: John

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Organization: Bishop Area Climbers Coalition

Title: Secretary

Comments: Dear United States Forest Service officials,

The Bishop Area Climbers Coalition strongly objects to the US Forest Service's (USFS) proposed directive FSM 2355.

While FSM 2355 is not a total ban on wilderness climbing, in many ways it is a ban on safe wilderness climbing. Most formations in the greater Sierra Nevada range require hardware to be left behind in order to descend. Every climbing opportunity in the wilderness requires the possibility for climbers to leave behind rappel equipment in case of inclement weather or emergency. In order to comply with FSM 2355, a climber in a lightning storm would have to remain high on a mountain or ridge instead of using an anchor to rappel down to safety. Even though FSM 2355 defines climbing as a legitimate use of wilderness, the directive would ban necessary safe climbing practices.

Furthermore, it is not clear why FSM 2355 is necessary. Climbing routes in wilderness already adhere to strict ethics, including sparing use of bolts and hardware. The environmental impact of climbing hardware is undocumented and likely non-existent. Climbing equipment is typically completely invisible to non-climbing user groups, unless a wilderness user searches for the hardware with binoculars. If the USFS is concerned about the environmental impact of climbing hardware in the wilderness, further evidence is needed before the organization proceeds with limiting hardware in wilderness.

Climbing is completely compatible with wilderness and is codified in the Wilderness Act as a legitimate use of wilderness. FSM 2355 would violate decades of legal precedent by banning many safe climbing practices. Even though FSM 2355 is not an outright ban, climbers would have their access to public land limited by this proposal.

FSM 2355 is too logistically complex and expensive to enact. Many National Forests across the United States have seen reductions in full-time staff, funding levels, and overall resources in the past 30 years. The proposed directive FSM 2355 would require each National Forest to document and potentially remove climbing hardware placed up to 80 years ago from the wilderness. This is an enormous task, and the directive does not suggest how funding will be allocated towards it.

This proposal contains broad language that could have serious unintended consequences. By limiting maintenance of existing anchor and installation of emergency anchors, climbers will have their ability to safely travel in the wilderness greatly limited. Climbing anchors are barely visible, and have no documented environmental impact. Enforcing FSM 2355 will be a huge obstacle for National Forests and will draw resources away from the other important work that the USFS does. By limiting most common safe climbing practices, this proposal reverses 60 years of legal precedent. The BACC strongly discourages the USFS from proceeding with this proposal.

Sincerely

The Bishop Area Climbers Coalition Board of Directors