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Comments: Thank you for this opportunity to comment on the new section (2355 - Climbing Opportunities) to Forest Service Manual (FSM) 2300 - Recreation, Wilderness, and Related Resource Management, Chapter 2350 - Trail, River, and Similar Recreation Opportunities. I am a member of a San Diego based climbers' advocacy organization and am concerned about the overly strict restrictions proposed on even minimal fixed anchors. We are an environmentally responsible membership-based climbers' advocacy organization dedicated to promoting and maintaining access to climbing and outdoor recreation.

We understand the USFS responsibility to balance user needs and the need to preserve the wilderness. We have the following specific comments:

1. Since the USFS proposed guidelines are fairly similar to the pending NPS proposal on fixed anchors, it is relevant to quote the significant national policy background. In 2013, considerable hearings led to NPS Director's Order 41 "climbing is a legitimate and appropriate use of wilderness" and that "the occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act," but that "the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation." This order directly states that minor anchors are NOT a violation of the Wilderness Act. It is only an issue when the numbers of anchors add up to a measurable impact. That is how the Wilderness Act definition of the word "installation" has been interpreted ever since the Act was passed in 1964.

2. Past government policy clearly accepted that small amounts of fixed anchors are appropriate in Wilderness. The leaders who passed the Wilderness Act, such as David Brower, never thought it would be used to stop minor placements of fixed anchors. The government never acted to speak up against anchors placed in places like Yosemite Valley, in full view of the Park headquarters. In places like Joshua Tree and Tuolumne Meadows in Yosemite NP, new routes have been done by the government climbing rangers which include bolts. (see addendum below*)

3. There is no good reason to require every minor fixed anchor to have a case by case review. It is only the combined impact of many fixed anchors that is a concern. It is only possibly significant when many fixed anchors are in one wall/zone/area. That is why Director's Order 41 of 2013 focused on the problem of large numbers of bolts: "The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support, and the types and levels of impacts associated with such routes."

4. It is clear that many of the objections to climbing anchors stem from a mistaken belief that there is a significant amount of rock altering by climbers. But a 2004 study of JTNP impact on bolts (page 31): "It concludes that fixed anchors are relatively insignificant to visitor flow patterns and that there are several other factors that can be used to predict where climbers will visit. From a geography perspective, fixed anchors play a minor role in use level models. Environmental Assessments (such as USDA Forest Service, Granite Mountain Wilderness, Arizona and NPS, City of Rocks, Idaho) have concluded that fixed anchors have no significant environmental impact. JTNP has determined that the amount of rock displaced in order to install a fixed anchor is also insignificant. From these vantages, the fixed anchor is benign." https://npgallery.nps.gov/GetAsset/3b9bab14-51cb-43e2-b078-917d2be25d84?

5. The suggested MRA process will be laborious and expensive, and will generally begin with a bias towards denying a permit. It is especially not feasible if it intends to include every minor anchor placement. There are not

enough resources at most wilderness management for each wilderness to individually study every anchor placement. So it is quite possible this proposal will lead to a several decades long moratorium awaiting the pending studies. It is very easy for bias to be applied behind closed doors because the wording of the proposed restrictions is highly vague. There is no definition of what is intended by "minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character." Also vague is, "Climbing that does not rely on use and placement of fixed anchors and fixed equipment, that is consistent with Leave No Trace principles, and does not concentrate human activity constitutes primitive and unconfined recreation and may occur in wilderness unless prohibited by a closure order." Bias could be especially likely with any rule requiring an MRA for replacement of anchors. If a wilderness has a significant issue with certain routes, that issue should generally be addressed in the detailed climbing strategy, and not left up to a closed room dealings.

6. Denial of anchor replacement is also a safety issue, that may lead to accidents of anchors failing.

7. Many wilderness places do not have an issue with anchors proliferating, and have no need for a bureaucratic permitting process. Other areas may have some old bolted routes that were done well before the area was declared a wilderness, and usually aren't pure wilderness since there are always somewhat arbitrary borders of wilderness. Those areas that do have concerns about anchors can formulate their own specific policies, with no need for a blanket national restriction. For example, Yosemite, La Madre (near Las Vegas), and North Cascades already have their own anchor policy.

8. The nature of traditional climbing exploration in remote wilderness is that some anchors may need to be placed, without having enough knowledge to file for a permit ahead of time.

9. The Congress of the USA is moving to pass the The Protecting America's Rock Climbing Act, which would establish consistency in how different federal land agencies manage Wilderness climbing and codify the long-standing federal policy that climbing activities, including the conditional use, placement, and maintenance of climbing anchors, are appropriate uses of America's Wilderness areas, subject to reasonable rules and regulations to protect Wilderness character. It does not dictate how each agency should allow fixed anchors, but it does prevent land management agencies from formalizing policies that would fundamentally prohibit standard Wilderness climbing practices. It does explicitly protect existing climbing routes and fixed anchors, as well as ensure that the bill will not be misinterpreted as a revision to the Wilderness Act.

Therefore, we respectfully request that these Draft Procedures be rewritten to - Allow minor amounts of fixed anchors without a permit. - Allow replacement of fixed anchors without a permit, especially long-established routes with old bolts. - Focus on writing a climbing management strategy for each wilderness that does not depend on an MRA process for which there are no resources to fairly implement. - Fully conform to the upcoming PARC Act including the Senate amendment