



Inyo National Forest Land Management Plan – Objection Form

Objections to the revised land management plan, associated environmental impact statement (EIS) or species of conservation concern (SCC) list must be submitted by October 3, 2018. This is not a public comment period. In order to file an objection, you must have previously submitted substantive formal comments during the planning process.

Objector's name: Access Fund- Erik Murdock

Address: 4720 Walnut Street, Suite 200, Boulder, CO 80301

Telephone number: 303-587-8039

Email: erik@accessfund.org, katie@accessfund.org

Name of lead objector (if more than one): Erik Murdock, Katie Goodwin-Access Fund

Specify if the objection is to the revised land management plan or SCC list. Please file one form per type of objection:

Inyo National Forest Revised Land Management Plan, Forest Supervisor Tammy Randall-Parker, Responsible Official

OR

Inyo National Forest species of conservation concern (SCC) list, Regional Forester Randy Moore, Responsible Official

Statement of issues and/or parts of the plan revision or SCC list to which the objection applies (what part of the revised plan or SCC list do you disagree with):

1) Vol 1. Pg 68- Wilderness Management Challenges and Trade-offs

'Fixed anchors are not allowed in wilderness, and the majority of the climbing community uses these.'

We object to the statement that fixed anchors are not allowed in Wilderness. Fixed anchors are allowed and exist in Wilderness, and there is no evidence to support that the majority of the climbing community uses fixed anchors. Access Fund comments made in the DEIS related to existing climbing areas that should not be added to Wilderness, were related to the need for maintenance of existing fixed anchors which are generally done with the use of power drills.

2) Vol. 1- Pg 555 & 557- Consequences Specific to Alternatives B and B-modified and Alternative C:

*'There are no known climbing areas with fixed anchors in any of the recommended wilderness areas in the preferred alternative. Climbing as a recreation activity is discussed in the Wilderness Evaluations (volume 2, appendix B). The use of power drills would be prohibited by law in recommended wilderness, however the rock climbing activities would still be allowed as a form of primitive recreation under the Wilderness Act 1964. Therefore, wilderness recommendations in the draft plan would not affect existing climbing opportunities, **it would only prohibit the potential for developing future climbing routes that use fixed anchors.**'*

Fixed anchors are legal in Wilderness, however the use of power drills to install or replace fixed anchors are not allowed in Wilderness. Fixed anchors can be placed using legal hand drill methods, which are in alignment with Wilderness policy. Hand drilled placement of fixed anchors typically limits the number of bolts placed due to the labor intensive nature of the activity.



Concise statement explaining the objection (why do you disagree with this part of the plan or SCC list):

1) ***'Fixed anchors are not allowed in wilderness, and the majority of the climbing community uses these.'***

We object to the statement that fixed anchors are not allowed in Wilderness. The use of power drills to place fixed anchors in Wilderness is prohibited, however the placement of hand drilled fixed anchors are allowed as part of rock climbing activities which are approved as a form of primitive recreation under the Wilderness Act 1964. The Forest Service has no policy managing fixed anchor use in Wilderness. The eligibility of placing new fixed anchors in existing or proposed Wilderness is not studied or reviewed in the Inyo National Forest Revised Land Management Plan nor in Appendix B: Wilderness Evaluation for the Inyo National Forest. This statement is being made with no direction or conclusion from the Plan.

2) We object to the language ***'would only prohibit the potential for developing future climbing routes that use fixed anchors.'*** Under the section- Affected Environment and Environmental Consequences.

The eligibility of placing new fixed anchors in existing or proposed Wilderness is not studied or reviewed in the Inyo National Forest Revised Land Management Plan nor in Appendix B: Wilderness Evaluation for the Inyo National Forest. This statement is being made with no direction or conclusion from the Plan.

The use of power drills to place fixed anchors in Wilderness is prohibited, however the placement of hand drilled fixed anchors is allowed as part of rock climbing activities which are approved as a form of primitive recreation under the Wilderness Act 1964. Hand drilled placement of fixed anchors typically limits the number of bolts placed due to the labor intensive nature of the activity.

Fixed anchors, defined by the Access Fund and the Forest Service, as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber's safety system. Fixed anchors are placed by the first ascensionist on technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in Wilderness. Currently there is no Forest Service Directive to manage fixed anchors in Wilderness (pending status of Forest Service Manual (FSM) 2320).

Suggestion for how the proposed plan should be improved (what do you propose as a solution to the part of the plan or SCC list that you disagree with):

[Click here to enter text.](#)

- 1) Existing: ***'Fixed anchors are not allowed in wilderness, and the majority of the climbing community uses these.'*** We suggest this statement be removed all together from the Plan. This language could create future management issues regarding fixed anchors.

We suggest this statement be replaced with: *'Fixed anchors placed/replaced with power drills are not allowed in Wilderness. Long-term maintenance of existing fixed anchors in non-wilderness is typically done with a power drill and is the best tool available to safely replace regularly used fixed anchors.'*

- 2) Existing: ***'would only prohibit the potential for developing future climbing routes that use fixed anchors.'***

We suggest this statement be replaced with: *'would only prohibit the potential for using power drills to place new fixed anchors and replace existing fixed anchors.'*

These suggested edits would eliminate the potential for future management issues related to fixed anchor use and management in Wilderness.



If applicable, identify how you believe the revised plan or SCC list is inconsistent with law, regulation, or policy:

We believe that the language stating fixed anchors are not allowed in Wilderness is inconsistent with Forest Service policy because there is no Forest Service policy to manage fixed anchors in Wilderness. In addition, many Forest Service areas explicitly allow fixed anchors in Wilderness (e.g. Shoshone National Forest).

Statement demonstrating the link between objection and prior formal comments (during which formal public comment period did you bring up this issue prior to this objection period? If this is a new issue since, state so):

Access Fund directly addressed managing fixed anchors related to climbing in Wilderness and non-Wilderness areas in the Inyo National Forest during the 2016 DEIS comment period. *'The Sierra, Sequoia and Inyo Forests should articulate a clear fixed anchor policy to promote climber safety in wilderness and non-wilderness areas. Fixed anchors are unobtrusive, and typically not visible to forest visitors. Fixed anchors should be permitted across all ROS categories (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary. For more information of fixed anchor technology and best practices visit: <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors.>'*

Signature:

X _____

Katie Goodwin
Access Fund- California Regional Director