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First name: Jacob

Last name: Bretz

Organization:

Title:

Comments: For a slew of reasons, the National Forest Service's fixed anchor climbing management proposal is unsatisfactory. Briefly, I will describe those positions below.

Asking for an already beleaguered wilderness management department to additionally fulfill Minimum Requirement analysis seems problematic on two points. First, policy drafters and compliance agents within the majority of national parks, monuments, etc. must address a wide variety of different policy concerns and draft simultaneously. Even in a forest with a more robust wilderness management apparatus which can field an employee to solely overview MRA documents, administrators are often overwhelmed with the sheer volume of proposed actions. To ask employees to shoulder further burden, particularly in as active of development areas that the USFS manages (Bighorn NF and the South Platte, for example) seems destined to result in poorer performance from those employees. Quantity often has a negative correlation with quality, especially when considering drafting complex (and often tedious) legal documents.

Second, most administrators considering MRAs employed by the national forest service have a poor understanding of the actuality of route development in the modern context. "How does this differ from lack of expertise MRA issuers must contend with in any other context?" one might ask. For one, proper climbing consultation seems less available than consultation provided by park geologists, hydrologists, engineers, and trail crews. Few national forests have a dedicated climbing management team--and for those with robust wilderness management teams, few managers possess understanding of the nuances and complexities of route development.

More vitally, a lengthy and bureaucratic approval process for route development serves as a barrier for entry to the climbing community. Historically, climbers are an independent (even counter-cultural) community. In many ways, climbing is a practice concerned with freedom (both in the more cultural liberal individualist sense and the embodied sense the action itself). Climbers often eschew social norms and regulations. It is important for land managers to gain buy-in from the climbing community if they are to effectively manage it. As it stands, I doubt many climbers who have already put in the blood, sweat, and tears to open a route in a wilderness setting will risk all of their previous planning and effort waiting (and waiting, and waiting) for land managers to determine if their fixed anchor proposal suits the minimum requirement for the necessary recreational administration of an area.

The question remains--is this proposal reactive or proactive? Have there been ridiculous abuses of fixed anchors in wilderness more recently? If it simply because of the fear of route development in the wilderness, that seems less like the purview of the executive agency, but rather in the hands of the legislative branch.

I have attached a copy of my Graduate Civic Engagement Project, in which I directly address these concerns in extensive detail. Particularly, I write in the context of the Bitterroot National Forest in Western Montana. Thank you.