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Title:

Comments:

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United States Forest Service

RE: FSM 2355 Climbing Opportunities #ORMS-3524

To Whom It May Concern:

Thank you for the opportunity to provide comments on the proposed directives related to climbing management on National Forest System (NFS) lands. The Telluride Mountain Club (TMtC) is a nonprofit organization based in Telluride, CO, with a mission to advocate for safe, accessible, enjoyable, and respectful opportunities for human-powered recreational activities in the Telluride region, through education, awareness, and collaboration. TMtC has been working closely with the USFS Norwood Ranger District over the last several years on trail projects and maintenance, hardware improvements at local rock climbing routes, and protection of outdoor recreation opportunities on public lands. We work hard to help preserve and enhance outdoor recreation in the larger Telluride community.

On November 17, 2023, the US Forest Service issued draft climbing management guidance for public comment. If implemented, the guidance would create significant safety issues, threaten world-class climbing routes (many of which were established prior to wilderness designations), obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape.

As climbers, fixed anchors are essential pieces of our safety system that allow us to safely and sustainably access vertical terrain. Without fixed anchors, many of the wildest and most inspiring places in America would become inaccessible to the public.

In the immediate Telluride region, the famed Lizard Head climb within the Lizard Head Wilderness, widely recognized as the hardest 13,000' peak in the state, would face future climbing hazards. Ensuring the safety of this route necessitates the presence of secure anchors at its summit. Failure to be able to update these anchors could expose climbers to significant safety risks. To the north, numerous hikes, climbs, and traverses in the Sneffels Wilderness will also be impacted. The renowned Sneffels 14er "hike" sometimes requires anchors for novice outdoor enthusiasts. Nearby, various sections of traversable ridgeline require rappel anchors for safe passage. Beyond our local geography, our members and supporters frequently explore Wilderness and National Park Service locations, such as the Black Canyon (NPS), Weminuche Wilderness, Canyonlands, Arches, Bears Ears, and many others, all of which offer climbing opportunities and are located within a two-hour radius of our community. Climbers would be negatively affected locally, regionally, and nationally.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow

judicious use of fixed anchors for more than a half century will continue to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community and specifically TMtC in the Telluride region. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Climbers have always relied on the legal and conditional use, placement, and maintenance of bolts and other fixed anchors. These anchors help keep these areas pristine, while still allowing climbers to safely ascend and descend technical routes. We urge you to reconsider the new policies that would classify fixed anchors as "prohibited installations" in Wilderness areas. This new classification would apply to both new and existing anchors-hindering Wilderness exploration, threatening the existence of longstanding established routes, and obstructing climbers' and our nonprofits' ability to replace old, unsafe bolts. This would threaten Telluride's climbing history and put the safety of our community at risk in the future.

Thank you for your consideration of these comments.

Heidi Lauterbach

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