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First name: Andrew

Last name: Bennett

Organization:

Title:

Comments: Andrew Bennett

Tucson, AZ

To Whom it May Concern at the USFS~

Please accept these comments on the proposed FSM 2355 Climbing Opportunities #ORMS-3524. I thank the agencies for including the public in this process and soliciting comment.

I climb, hike, backpack, and hunt in Southern Arizona. I am also an active member of the local climbing organizations. For over a decade here I have volunteered with the Climbing Association of Southern Arizona to improve system trails, conduct erosion control and trash cleanup at and around climbing areas, and maintain and replace fixed anchors. The local climbing community is a diverse and active group that has, to my knowledge, rarely, if ever, had any negative interactions with the Coronado National Forest or other Forest users. Quite the contrary, indeed. Climbers are often seen and appreciated by other users on the many cliffs and towers on our Forest, and the Forest even celebrates climbing as an important Forest recreation opportunity. The Coronado NF has repeatedly expressed its heartfelt thanks to the climbing community for what it has done for the Forest here. Similarly, the climbing community here has also been an effectively self-regulating entity that has rarely had any issues with other users, rather, it has established climbing opportunities and maintained them at a safe level as needed over the years.

#### Fixed Anchors on USFS Wilderness Lands

Nothing in the Wilderness Act or its legislative history indicates Congress' intent that the word "installation" in section 4(c) of the Act apply to fixed anchors. The USFS draft guidance interpretation is a new one and may well represent a requirement as a legislative rule-making under the Administrative Procedure Act. Making this policy change contrary to the APA to now label fixed anchors in wilderness as "installations" would therefore open the agency up to costly and unnecessary litigation. The climbing community has been effectively self-regulating for many decades and this rule change is an unnecessary about-face that is illegal and defies decades of interpretation of the Wilderness Act.

The agencies have been aware of the minority argument that fixed anchors are section 4(c) installations for over 30 years and have never issued national policy or promulgated rules adopting this argument despite numerous policy and rulemaking efforts regarding climbing.

Since 1989, the agencies have issued numerous unit-specific planning documents addressing fixed anchors and, except for a few, these planning documents did not rely on the theory that fixed anchors are section 4(c) installations. Quite the opposite, the agencies developed climbing management plans and created climbing management and ranger positions without the need to label any fixed anchor as an "installation".

I have personally needed to place a fixed anchor on numerous occasions while climbing a new route in (and outside of) designated NFS wilderness. When a climbing party is attempting a new route, it is often impossible to determine where the route may go, end, and/or where dangerous or extremely difficult, impassable terrain may be encountered. If you're not a rock climber, it may be hard to understand the systems and processes at play

here, but let me assure you, and I am sure most climbers' comments will concur, that it is often essential to place a fixed anchor to ascend or escape a rock face. The same goes for already-established rock climbs: geology acts, and the route may now, unbeknownst to the climber, be unsafe to climb; a new, fixed anchor may now be the only way off or up a climb. The ability for climbing party to make this decision during their climb is essential to life and limb. We are talking about life or death in many circumstances. The ability for a team to make in-the-minute decisions on fixed anchors is essential.

If fixed anchor maintenance and replacement in wilderness is not allowed, the fixed anchors on some routes could degrade and become dangerous. Furthermore, if the climbing community is forced to wait through interminable MRAs before replacement/maintenance is permitted, existing anchors that could have been maintained or replaced will continue to degrade, again, posing a dangerous safety risk. In either case, uninformed climbers could literally be climbing into a serious safety hazard. Existing fixed anchor maintenance and replacement should continue to be allowed, as it always has been, in and outside of wilderness. Furthermore, these unsafe conditions would eventually become well-known, forcing climbers to avoid these climbs and funneling much more traffic to safer areas; this change in visitor use patterns would change the human environment and, without question, require NEPA and an EA and FONSI, at the very least, for each fixed anchor or route. This is just not within the realm of possible management capabilities for the USFS. These concerns also apply to fixed anchors in non-wilderness.

All of these comments also apply to fixed anchors on canyoneering routes, an activity that I also partake in within and outside of designated wilderness. Many canyons are impossible to traverse without fixed anchors. The ability for a team to make in-the-minute decisions on fixed anchors is essential.

#### Fixed Anchors on Non-Wilderness NFS Lands

Fixed anchors on existing climbs in non-wilderness should be considered approved until the appropriate resource analyses can be performed to ascertain if any sensitive resources are being threatened or damaged or user conflicts are occurring because of the existence of these anchors. This directive should have a broad, Agency-level scope, while the decisions to allow or prohibit existing fixed anchors should be managed at the District (or Forest office, at the highest) level. Local climbing organizations represent the primary users of these anchors, and thus should be intimately involved in the decision-making process. Climbers could also be involved in the climbing route-vicinity resource analysis, as they are typically excellent hikers and observers and the majority have a strong conservation ethic and willingness and enthusiasm for collaborating with the USFS and other users. The USFS needs all the (volunteer) help they can get these days given the ever-shrinking funding allocated to it, especially with matters such as this.