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Comments: The proposed interpretation by the Forest Service "that fixed anchors and fixed equipment are installations for purposes of section 4(c) of the Wilderness Act (16 U.S.C. 1133(c)) (proposed FSM 2355.32, para. 1)" is inconsistent with the past decades of practice by federal agencies and the original intent of the Wilderness Act, which acknowledged climbing as a legitimate use of wilderness and was at that time a practice that already included many and various fixed anchors used for safe passage.

Suggesting "that a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes, including primitive or unconfined recreation and preservation of wilderness character (proposed FSM 2355.32, para. 1)" is the appropriate means to determine when a fixed anchor may be appropriate is a serious safety concern for climbers. Forest Supervisors typically lack any experience to know when a fixed anchor may require replacement and would not have sufficient judgement to evaluate the appropriateness of proposed fixed anchors for new climbing routes.

The proposed rule changes do not provide a clear definition of what constitutes primitive or unconfined recreation for a climber and therefore does not create consistency across the FS when implementing the proposed rule changes. It is highly likely therefore that each Forest Supervisor will bring their own biases to what primitive or unconfined recreation is for a climber and there will be less consistency rather than more consistency, i.e., the proposed rule changes would not address the purported issue. Further, suggesting that only using a Minimum Requirements Analysis as the means to judge the appropriateness of existing fixed anchors and fixed equipment in wilderness that may be retained omits climber safety, local historical practice, and real opportunities for public input.

The burden of proof of actual impacts to wilderness character (or other resources) should be on the Forest Service to demonstrate prior to any action related to fixed anchors at a local Forest level rather than suggesting impacts are occurring nationally and then extrapolating that they therefore are also happening locally in each Forest. The Forest Service should provide a more fulsome user and recreational dataset that actually demonstrates the purported impacts these rule changes are proposed to address, as well as more clearly identifies how the proposed rule changes will address the supposed impacts and result in greater consistency in management across the U.S. The rule changes as proposed neither clearly identify the issues that are supposed to be addressed or explain how allowing each Forest Supervisor to choose what is safe for climbers and constitutes primitive or unconfined recreation will be better and more consistent than the no-action alternative.