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Comments: As a long-time climber, conservationist, and user of National Forests, as well as a representative of the American Safe Climbing Association (ASCA), I am compelled to urgently comment on the US Forest Service proposed "Proposed FSM 2355 Climbing Directives".

These management directives propose to reverse nearly 50 years of policy under the Wilderness Act, and will severely erode a century of cooperation between the climbing community and the US Forest Service. Here I will outline the reasons why:

1. Climbers have been responsibly recreating in the wilderness since before the passage of the Wilderness Act. The current fixed anchor policy requires the use of hand-drilling to install fixed anchors, which already significantly limits the quantity of fixed hardware (generally mechanical bolts) that can be installed. Fixed hardware is installed either to protect unprotectable faces and sections between crack systems or to enable safe rappel descent.

2. Many summits, towers, and walls require rappel descent. Camouflaged, bolted anchors with stainless steel mechanical bolts (which are the ASCA's recommendation for fixed rappel anchors) are the safest, most durable, and lowest-impact rappel anchors. The alternatives to bolted anchors are leaving slings or cords on vegetation, which is both unsightly and can damage sensitive vegetation over time, or slinging existing features such as flakes, chockstones, or other natural constrictions. These alternatives are much more visible as slings and cord are larger and have a greater visual profile, much less durable as they are susceptible to UV damage, and greatly increase the risk of accidents occurring when damaged cord is used that cannot be properly inspected.

3. Wilderness routes are typically approached in a ground-up style, which involves considerable adventure and self-reliance. The ground-up ethos aligns with maintaining a primitive and unconfined recreation quality of the wilderness. Imposing restrictions on the kind of hardware that can be left when establishing a new route, by definition, confines and restricts the recreation quality of the wilderness and can create very dangerous situations for climbers attempting to climb new routes.

4. There is no way to know what kind of protection will be required before climbing a new route and how many bolts will have to be installed. Requiring a permit before climbing a route is a de-facto ban of new routes because new routes are an adventure into the unknown. Failure of the USFS to understand this is not an acceptable excuse for creating an unrealistic new directive. As an individual and as a representative of the ASCA, I beg you to reconsider this directive before you forever change the ability of climbers to climb new routes in the wilderness safely.

5. Climbing routes that follow continuous crack systems from start to finish and have walk-off descents that don't require rappelling are exceedingly rare. Requiring permits for fixed hardware will essentially limit new routes to those that follow continuous crack systems to enable only the use of removable protection and don't require rappel descents. Again, there is no way to know if a bolt is required to protect a section of climbing until a route is climbed.

6. The climbing community has a vested interest in preserving the primitive, unconfined, and solitary nature of the wilderness. We enjoy and explore these wild places and always try to minimize our impact. I will give you several examples of how we do this. The ASCA is a mostly volunteer-run, nonprofit organization that replaces old and unsafe climbing hardware and re-uses existing holes whenever possible, both to make climbing and descending safer and to preserve the rock for future generations. We use durable stainless steel hardware with an estimated

lifespan of 50-100 years or more that we camouflage to match the color of the rock. This makes protection and anchor bolts invisible from a distance. When we replace hardware, we remove unsightly slings and unnecessary fixed hardware to reduce the visual impact of anchors. Please read our best practices to see how we strive to make climbing safer, reduce visual impact, and help preserve our priceless natural resources for future generations: <https://safeclimbing.org/best-practices-for-hardware-and-placement>

7. The climbing community is generally highly educated about Leave-No-Trace principles. Our local and national stewardship organizations are continually educating climbers on how to reduce impact and protect wilderness climbing areas. Climbers have a small impact in wilderness areas compared to recreational users and hikers, who are present in larger numbers and are generally less educated and likelier to leave trash, go off trail, or otherwise fail to practice Leave-No-Trace principles. Placing undue and unreasonable restrictions on climbing will not protect wilderness areas but will severely strain a largely beneficial and cooperative relationship between the climbing community and the US Forest Service. This will benefit neither climbers nor the USFS, as we are allies in preserving our wilderness areas.

In summary, I believe this draft directive to be misguided, uninformed, and unrealistic. I propose consulting the organizations that represent the climbing community, namely the Access Fund and the American Safe Climbing Association, as well as many local climbing stewardship organizations, before issuing a draft proposal for climbing management directives in the future. This draft directive is hurried and contains an agenda that serves neither the wilderness areas nor climbers as a user group.

A more realistic proposal will allow the placement of hand-drilled anchors and protection bolts, placed sparingly and with respect for the rock and the environment, on ground-up ascents in the wilderness. We are against the requirements for permits for new routes. However, if a permit for a new route must be issued in certain rare and sensitive areas, it cannot require an exact fixed hardware count or even hardware types because this information is impossible to know in advance. Climbers approach new routes prepared for any number of possibilities and don't always use bolts or pitons if their use is unnecessary.

Please don't restrict the ability of climbers to safely and responsibly recreate in our wilderness areas in ways that is completely in line with the 1964 Wilderness Act.