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Comments: Hello,

I understand the desire to keep natural, untrammelled, solitude, primitive wilderness character in our Wilderness Areas. These values are what I love most about these areas when I visit and it is very unique to the US. As a climber, especially in California, I feel we often exemplify the wilderness character of self-sufficient, rugged exploration and engagement in these areas. Climbers access areas that no other visitors can visit and take on unique risks in that pursuit. Almost all routes and features of the alpine style of climbing which employs the 'clean climbing' ethics mentioned are in such Wilderness Areas.

I have found these Wilderness Area fixed anchor management plans very uninformed and have serious concerns that the NFS will have adequate staff with the required expertise to execute an MRA with proper recognition of my safety performing recreation that is sanctioned and authorized on these lands. There may be no better example of this misinformation than the reference of "chipping" i.e. "the use of rock hammers to chip hand holds or foot holds into the rock" under a section related to "Fixed Anchors and Fixed Equipment" of which chipping is neither. This practice (which is the rarest upon rarest of situations in the climbing community) is so adamantly opposed by the entire climbing community it could well lead to physical violence if someone was performing this practice. I have heard about it done in one area of the US to outrage over the last ten years and have only ever seen it as prior evidence from pioneers. I have no faith the NFS has the staff and expertise to evaluate whether an anchor is "necessary", what type of anchor is "appropriate" and expeditious approval for replacement and maintenance.

Until the NFS takes on the ownership over installation and maintenance of these fixed anchors, they should not be involved in one-by-one approval of installation and maintenance of this equipment that we climbers rely upon. Today, these fixed anchors are installed on a case-by-case basis under cost of an individual of the community, while they have the time, money and expertise to install/maintain them. The number of people who do this is extremely small in the climbing community and any additional obstacle will increase risks of severe injury or death on our public lands for all climbers.

I also have low confidence the NFS staff have enough requisite experience and relationship with the climbing community to determine the value of climbing in areas and fulfill such aspects of this proposal. For example to determine whether climbing provides "outstanding opportunities for primitive or unconfined recreation" in an area.

It seems to me the fixed anchor bans are a solution to no problem, but an arbitrary attempt to limit a sanctioned recreation activity in these areas. Almost all fixed anchors in wilderness will never be seen by someone who does not climb, but their absence will increase the risk of the activity along with the frequency and severity of injury, death and rescue. I have yet to hear a good reason we are trading such physical danger to climbers and rescuers for these management plans to restrict and limit fixed anchors.

Please revise your climbing guidance to reflect the practice and precedent of the last century where fixed anchors for climbing have been used, replaced, and maintained in designated on these lands without additional restriction or limitation. My life depends on it.

Brice