Data Submitted (UTC 11): 12/20/2023 4:40:19 AM

First name: Samuel Last name: Foreman

Organization:

Title: Comments: Hello!

I am writing to ask you please consider my opinion and the opinion of climbers in regards to the proposed directives related to climbing management on National Forest System (NFS) lands (2355 - Climbing Opportunities). While I understand and agree for the need for creating a robust management plan that includes managing climbing, I have a few concerns regarding the language in the current proposal. Please consider these

few changes below:

1. Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. To compare climbers fixed anchors to installations such as roads or buildings is unreasonable as these fixed anchors have very little impact on the environment. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

- 2. Prohibiting fixed anchors will create safety issues by imposing unnecessary bureaucratic obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. 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.
- 3. 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.
- 4. 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.
- 5. 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.
- 6. 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.

Please, please reconsider the effects of the language used in the proposal. The future of climbing and climbers like me depends on your careful drafting of this plan. Thank you so much for your time and consideration!