Data Submitted (UTC 11): 12/25/2023 5:37:24 PM First name: Jeremy Last name: Schlick Organization: Title: Comments: 12/25/2023

To Whom it may concern,

I am writing today to stand in opposition to the proposed changes to how fixed hardware is used and maintained across USFS lands as cited in FSM 2355. Any infringement on the climbing communities ability to maintain fixed hardware, whether in designated wilderness areas or not, is dangerous and irresponsible policy. You know it, and the climbing community knows it. What climbers do is a legitimate and appropriate use of USFS lands. We have long been champions of the wilderness act and our activities are not at odds with this act. This policy change would also affect many other user groups which rely on the use of some sort of fixed anchors to navigate wild lands. Furthermore, I find the timing and presentation of these iniquitous policy changes to be highly questionable and the motives suspicious.

Defining fixed anchors in wilderness as "prohibited installations" goes against nearly sixty years of precedent. No where in the Wilderness Act does it say that fixed anchors are prohibited. Instead, it has always been understood that such anchors are used for the unconfined recreation and exploration of wilderness lands. Again, you know this, and the climbing community knows this.

Such changes in policy will create dangerous situations for climbers and other user groups as it will restrict the in the moment safety decisions that so many of us face every time we climb, canyoneer, cave, backcountry ski/snowbaord, high line, hunt, fish, and on and on.

Any attempt by your agency to manage fixed anchors through the use of MRAs is unacceptable, and will be challenged at every turn, thus opening up your agency to endless litigation. If your goal is control the lands by limiting access you are working against your own mission. The introduction of this process will only obfuscate the intentions and use of fixed hardware to the point that any one individual or agency will not know what's been deemed legitimate or prohibited. As I understand it, this appears to be the whole point of this devious and ill-composed scheme.

I have been rock climbing for thirty three years, all across the United States. Your proposed policy changes would also serve as a launch pad to erase decades and decades of historically and contemporarily relevant rock climbs across the country. As climbers, we enjoy a rich and colorful history that spans at least one hundred years of fearless exploration and adventure. The routes that were established along the way have become more than just routes up a cliff face. They have become icons of the landscapes themselves. They have become old friends that we revisit year after year, after year. They have become training grounds for new generations of climbers to learn the ropes. These routes have become teachers, guides, and trusted companions for both personal and community growth. Any climbing management plan must include language that is clear in its intent, that these routes should be protected and celebrated.

And lastly, restricting the establishment of new routes on non wilderness USFS lands will only create confusion and tension between land managers and climbers, it would be largely unenforceable. I understand the financial constraints your department operates on. However, the conversation should not be how can the Forest Service restrict access because of such constraints, but rather, how can the Forest Service partner with respected organizations to find common ground and paths forward that do not limit or restrict the valid use public lands. Sincerely,

Jeremy Schlick