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Comments: To whom it may concern:

I am writing in strong opposition to the proposed directives for climbing management on National Forest Service Lands. As a professional climber myself, I have spent countless hours climbing in Wilderness Areas, and these proposed procedures would have massive negative impacts -- not just to the climbing community, but to the land in general. I have provided my email above. Feel free to reach out with any additional questions as to how the proposed management policy will ultimately backfire.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. 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.

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. Climbers are excellent stewards (see initiatives such as the Yosemite Facelift), and they contribute positively to the land.

Prohibiting fixed anchors will create safety issues by imposing unnecessary 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.

Furthermore, there would be many unintended consequences of the proposed plan. Climbers plan on existing anchors, and without them they can easily get stranded on remote cliff faces. They will resort to less safe and more destructive measures, such as rappelling off of trees, to get down safely. This will be far more destructive to the land than any bolt could have been.

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.

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.

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.

I hope you reconsider this policy.