

Data Submitted (UTC 11): 1/3/2024 10:12:06 PM

First name: Peter

Last name: Morel

Organization:

Title:

Comments: Dear Sirs,

I am writing to share my comments on this climbing management guidance draft. I am a lifelong rock and alpine climber, as well as an outdoor educator and guide. I am an LNT educator and have extensive outdoor leadership experience and training, including training through the American Mountain Guide Association.

I am strongly opposed to the fixed anchor management plan laid out in this document, and urge that what is laid out currently in regard to fixed anchors be amended or omitted from this draft and not enacted as policy. I am concerned about and request changes to what has been laid out in the document regarding:

The de facto prohibition of necessary fixed anchors on climbing routes by considering them "installations." This is a reversal of generations of history and standard practice in North American climbing in National Forest lands and other other remote areas, and this has always been self-managed by the climbing community. The MRA process as it is laid out and in relation to this document's defining any fixed anchor as an "installation" is not reasonable as it creates an undue workload for FS land managers which would effectively result in a de facto prohibition on fixed anchors. This in turn will lead to (among other serious issues):

- Attrition of existing anchors (because they can't be replaced in a timely manner)
- Loss of access for the American people to many historic climbing routes throughout the US
- Some climbers taking undue risk because of this prohibition and climbing routes without adequate protection in place
- Other climbers using sub-standard/unsafe anchors in lieu of fixed ones
- Loss of options for future generations of explorers and climbers to engage with our wilderness through the time-honored and historic American tradition of climbing
- Serious injury and death will absolutely occur due to climbers being unnecessarily left to use improvised in situ anchors (ie, cord, webbing, etc, which deteriorate quickly in wilderness areas and fail due to exposure) in lieu of much safer fixed anchors (usually bolts). This especially will affect rappelling, where fixed anchors greatly reduce the risk of catastrophic accidents.

As a climber and educator, I strongly believe in and advocate for stewardship of the wilderness and responsible exploration/use of our beautiful national parks, and I commend the USFS' efforts to preserve and protect our wild places. This simply is not what the issue of fixed anchors is about. As a practical example- I have climbed in the Wind River Range for many years and know of many examples of rappel anchor failure prior to the installation of bolted rappel anchors, but I have seen these examples vastly decrease since the installation of bolted rappel anchors on some of the more popular routes. This has created a much, much greater safety margin for climbers in this popular area and has also reduced the visual impact that colorful slings created in the past.

Additionally, this proposal does not line up with pending legislation in congress such as the PARC Act (now part of the EXPLORE Act), which advocates preserving the freedom for leaders in the climbing community to judiciously place fixed protection as needed for safe exploration of wilderness areas while not damaging/altering the alpine ecosystem.

Please reconsider and amend this draft to accurately re-define what is interpreted as an "installation" to not include fixed climbing anchors before this document is made policy- the safety of the American Public and many future explorers of our great wilderness lands is at stake if this is not changed.

Thank you.

Peter Morel