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First name: Rebecca

Last name: Thorsness

Organization:

Title:

Comments: Thank you for the opportunity to submit comment on on the climbing management on National Forest System lands. I greatly appreciate USFS' dedication to protecting National Forests and other Public Lands in the United States, including Wilderness Areas.

However, I am strongly concerned about the proposal to prohibit, or make it difficult to replace, Wilderness climbing anchors. These fixed anchors have been allowed, managed, and authorized for decades. Properly installed fixed anchors (generally two bolts with rings or chain links, frequently painted to match the rock color) are safer and lower-impact than any other alternative (left behind "tat" rope nests which can fail when exposed to the elements and are unsightly; rappelling off of trees damages the tree). Rescues are high-impact events, and safe climbing anchors can greatly reduce the number of rescues needed in an area where people will recreate and climb.

Fixed anchor maintenance is generally undertaken by the local climbing community, oftentimes in consultation with Climbing Rangers in areas that have one. (Side note - Climbing Rangers are awesome, and should be utilized as much as possible in high-use areas.) Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes, and should not be impeded by a time-consuming and cumbersome authorization process.

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.

Finally, 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. Local climbing communities have a long history of self-regulating to ensure new route development is appropriate, ethical and safe. In the few instances in which this has not been the case, USFS and other public land managers already have the ability to step in and halt all new route development in an area until the issue is resolved. Therefore, this restriction is unnecessary and is an overcorrection to a problem that does not exist.

I look forward to the opportunity to enjoy public lands, including Wilderness Areas, in a manner that balances the need to minimize my impact on the area with the emotional and physical benefits such areas provide to me, and the economic impacts my participation has on the surrounding communities. Safe fixed climbing anchors and ethical new route development allow me, and millions of other Americans, to do so.

Thank you for your consideration and all of your work in this area.