Data Submitted (UTC 11): 1/5/2024 6:27:26 PM

First name: Steven Last name: Davis Organization:

Title:

Comments: Greetings! As a lifelong backpacker, I appreciate the efforts of the USFS to maintain its wilderness areas in a pristine state. I'm also a rockclimber, and am concerned about a proposal that would eliminate the installation and maintenance of fixed protection in wilderness areas. Climbing in the USFS is a heritage activity that long predates the Wilderness Act. While this is of course a matter of climber safety, there are important ways in which the current system protects the wilderness character of natural areas.

Without fixed anchors, climbers must often resort to topping out on routes and setting up a rappel system to descend, or creating new descent trails. This causes erosion on cliff tops, and often harm to clifftope trees which may be the only anchors available if fixed anchors are not allowed. Fixed anchors reduce the impact on fragile clifftop environments and reduce the proliferation of use trails.

The proposal would make the USFS de facto managers of popular climbing areas, tasked with reviewing existing fixed protection and approving new fixed protection. I cannot imagine that the USFS would receive the additional funding to take on this new mandate.

On the other hand, climbers have demonstrated themselves to be good stewards of the climbing areas in which they can safely climb. We advocate regularly for funding, and contribute our own labor in restoring and maintaining the wilderness character of climbing areas. This proposal threatens our stakeholding, stewardship, and ongoing advocacy.

I hope that the USFS will advocate for no change in the current system of regulating fixed protection.