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Comments: I am writing today to express my views regarding the proposed directives related to climbing management on National Forest lands. Though the USFS is not required to request public comments on this policy, I greatly appreciate the opportunity to do so.

I have been a backpacker, mountaineer, rock and ice climber, and backcountry skier for over 40 years, enjoying the tremendous wilderness characteristics of numerous National Forests across the United States. My career path for over 30 years has involved guiding and educating new visitors to these areas, and how to enjoy them responsibly and appropriately.

As a great supporter of the 1964 Wilderness Act, I recognize that the critical principle of minimal intrusion to these places is integral to their value, and that as few compromises as possible should be made to this principle. Trails, trail signs, bridges, backcountry ranger stations are all appropriate minimal exceptions that allow improved experiences in wilderness areas.

Likewise, fixed anchors for climbing and mountaineering activities are appropriate, minimal exceptions that allow experiencing wilderness areas, and are directly related to safety of those who use them. Indeed, climbing activities and related fixed anchors significantly pre-date the 1964 Wilderness Act, and this should be considered in the development of any kind of management policy. Anchors such as bolts are far less of an 'installation' than virtually any trail, sign, bridge or building that have been created in these areas, and are far, far less recognizable to anyone.

I do support the idea of a management plan for such fixed anchors, as a means of keeping their impacts as minimal as possible to the environment, and to other users of these areas. Such a policy should be practical and reasonable to implement, and to manage going forward. Minimum Requirement Analysis processes are reasonable in concept, but the practice of applying it to all existing fixed anchors, or requiring it for new or replacement anchors, is simply unrealistic and unachievable. Such a process would be extremely time intensive, costly, and hazardous to USFS employees to achieve- in the meantime, the routes where these anchors exist would be increasingly hazardous to anyone who must use them. If the MRA process is to be applied to fixed anchors, it should start with a policy that provides approval for those currently in place, with the MRA process applied when a new route is proposed. This process should involve the climbing community, and there should be a dedicated resource within each National Forest to consider and process these proposals in a timely manner.

Any kind of policy that provides primary discretion to a single manager would be subject to their own biases related to fixed anchors and climbing, in general. A clear, broad policy that states that climbing is an acceptable activity in all wilderness areas, and that fixed anchors are integral to this activity, should be implemented. The 'Protecting America's Rock Climbing' Act contains many quality provisions, and is based upon these principles.

I hope that the USFS will recognize the historic nature of climbing in designated wilderness areas, and develop a policy that will provide clear support for the minimal intrusion that it creates. Thank you again for the opportunity to provide my views on this important matter.