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Comments: The Forest Service is proposing a new directive, Section 2355 - Climbing Opportunities, to the Forest Service Manual. Several of the recommendations, such as development of climbing management plans, are good, and needed to prevent adverse impacts to Federal Lands. However, the classification of fixed anchors (bolts, pitons, slings) as "prohibited installations" in Wilderness areas is not appropriate and inconsistent with decades of prior permitted use by climbers. This policy would overturn over five decades of sustainable Wilderness climbing precedent and potentially remove some of America's most loved and iconic climbs. I am opposed to this proposed classification. It would severely limit climbing, an allowed and justifiable activity as stated in the directive itself and does not best serve the American people. Furthermore, 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.

*Fixed anchors are essential for enabling safe climbing. They provide a safe means of retreat/return to the ground after completing a climb, or as occasional mid-route protection from a dangerous fall when removable protection is not available.

*Rock climbing is a peaceful, human-powered activity that is completely compatible with Wilderness character and existing protections. Banning rock climbing from Wilderness is not, and should not be the intent of these policies, but will have that de-facto effect.

*Banning fixed anchors in wilderness will make climbing extremely unsafe, effectively prohibiting this activity, which has been allowed in Wilderness for decades.

*Fixed anchors have been allowed in Wilderness for decades, and a reversal of Federal policy at this point seems unfair and unreasonable, especially considering the dramatic increase in demand for outdoor recreation over the past several years. Prohibiting fixed anchors, and thus greatly diminishing the number of climbers venturing into Wilderness, will increase congestion at already popular roadside areas, and discourage user groups to explore farther afield.

*To preserve existing and popular climbing routes, climbers need the ability to maintain and replace fixed anchors as they age to ensure safety of the hardware and allow users to safely return to the ground.

*Proliferation of fixed anchors has been effectively limited by prohibiting use of power drills for their installation. This policy has effectively minimized the number of fixed anchors visible on climbing routes for decades and remains sufficient for minimizing the negligible visibility of fixed anchors.

The points above outline the reasonable case for the need for continued use of fixed anchors in Wilderness areas. Please reconsider labeling them as "prohibited installations" to make new policy consistent with decades of reasonable, minimum impact use under existing policy. Also, placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination is unworkable and will serve as an effective ban on new routes, or maintenance of existing routes to keep anchors in good shape to keep climbers safe. This is not in the best interest of the recreating public.

Sincerely,

Ken Cragin