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First name: Catharine

Last name: Saint-Croix

Organization:

Title:

Comments: Hello! Thank you for the opportunity to comment on this pending measure.

I write to express trepidation about this measure. While I understand that this is intended to support the preservation of wilderness areas while still allowing climbing, I worry that it will be ineffective in both purposes and dangerous to climbers. As a climber, a supporter of the USFS, and an avid lover of the outdoors, I urge you to revise this policy in consultation with the Access Fund and other climbing advocacy organizations.

With respect to the latter---danger to climbers---I am most concerned about the proposal that "that a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes". I understand that this is meant to allow continuance of climbing in certain areas, and I appreciate that. However, it also means that a climber who notices a worn rappel ring or similar may violate this policy in fixing it. This is a severe danger to the lives of others. Climbing routes are kept safe by our community. When I go out, I try to bring along a "quick link" in case I find something that needs to be replaced. If I find a sketchy bolt---something that is common, given the radical technological improvements in this area over recent decades---I make reports to people who have taken responsibility for the area. If such people are worried that they may be in violation for making such repairs, they may not happen. And that puts the lives of people like me at risk.

Nevertheless, I understand that there is need to protect some areas from development. With that in mind, I think it would be better for this policy to be written opt-out rather than opt-in, as it currently is. Instead of ruling areas in for development and repair, ruling them out (so that the default is that existing areas can be maintained and repaired) is a safer, more responsible policy.

As to the other point---ineffectiveness---I would like to make two points. First, a blanket ban like this will mean that many people (those who are determined to maintain the safety of existing areas, for example) will simply break the policy heedlessly. By contrast, under the exception-based protocol suggested in the previous paragraph, they may be more likely to respect well-reasoned exceptions. As support for this, I would like to point out that our community has worked closely with the Native American community surrounding Devil's Tower to respect religious observation. We do not climb during the periods in which we are asked not to. Similarly, we often watch for falcon nesting warnings and the like in other areas. Exceptions work, bans will not.

Second, this is not necessary to preserve the character of these areas. Bolts and other fixed equipment are basically invisible to non-climbers. With the exception of seasoned forest professionals, whose lives are shaped daily by observation of these areas, people who do not climb seldom notice bolts---even people who do climb often miss them until they look hard for them! So, insofar as the benefit of this measure is intended to be preserving the character of wild spaces, I think it is small. It is especially small in comparison with the danger it poses to climbers.

Beyond all of this, though, setting aside argument for a moment, I love climbing. It is a source of profound joy in my life and the lives of those I love. I am proud of USFS, BLM, and NPS as American institutions that support the wild spirit of climbing. I hope USFS will continue that support, and revise this measure in doing so.

Thank you, again, for the opportunity to comment!