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Title:

Comments: Dear United States Forest Service.

I am writing to express my deep concerns regarding the recent draft climbing management guidance proposed by the US Forest Service and the National Park Service. This proposal, if implemented, will significantly affect climbers' safety and the exploration of both wilderness and non-wilderness areas under USFS jurisdiction.

Firstly, fixed anchors are a critical component of climbers' safety systems, not mere prohibited "installations" as the Wilderness Act might suggest. The long-standing practice of allowing judicious use of fixed anchors has been instrumental in maintaining the Wilderness character while enabling primitive and unconfined Wilderness climbing experiences. It is imperative that this existing policy continues to be recognized and respected.

Moreover, it is unreasonable for federal agencies to introduce new guidance policies that prohibit Wilderness climbing anchors when there has been a historical precedent of allowing, managing, and authorizing such anchors for decades. This abrupt policy shift could lead to significant safety issues, particularly by imposing barriers to the regular maintenance of fixed anchors, a responsibility that the climbing community has traditionally upheld. Climbers are often required to make critical safety decisions swiftly, and any authorization process must not hinder these decisions. The maintenance of fixed anchors must be managed to ensure safe replacement and to avoid the unnecessary removal of climbing routes.

Additionally, the proposed guidance impedes appropriate exploration of Wilderness areas. Land managers should enable climbers to make in-the-moment decisions vital for navigating complex vertical terrain. The prohibition of fixed anchors not only threatens climbers' safety but also diminishes the wilderness experience.

In the context of non-Wilderness lands, the restriction of establishing new routes to "existing climbing opportunities" is highly concerning. This approach is unenforceable and will likely result in confusion among land managers and climbers. The policy to limit new anchor approvals only for new climbing opportunities that have been evaluated for natural and cultural resource impacts is highly subjective and could severely restrict the development of climbing. Non-Wilderness climbing management should continue to allow opportunities for new anchors, with restrictions implemented only after thorough analyses determine that climbing should be limited to protect cultural and natural resources.

Moreover, this policy risks erasing an essential part of America's climbing heritage. Many iconic and historical climbing routes could be threatened under these new regulations. It is vital that climbing management policies protect these routes, recognizing their value in the climbing community and in American cultural and recreational history.

In closing, I urge the US Forest Service to reconsider the proposed guidance on climbing management in both wilderness and non-wilderness areas. It is crucial to maintain a balance that upholds wilderness character and climber safety, as well as the historical and cultural significance of climbing routes. The existing practices regarding the use of fixed anchors have proven effective and should be continued.

Thank you for your attention to these concerns. I hope to see a resolution that aligns with the interests of both environmental conservation and the climbing community.

Sincerely,