Data Submitted (UTC 11): 1/15/2024 7:09:55 PM

First name: Harold Last name: Fleming Organization:

Title:

Comments: Dear Sirs:

Regarding the proposed directives related to climbing management on NFS lands, as a climber and a fly fisherman, I have real concerns. Given my frequent enjoyment of both of these activities on NFS lands, and though perhaps not a unique combination of activities per se, I nonetheless have acquired a perspective on impacts that both of these activities may have.

My experience is that fixed climbing anchors/equipment in National Forest and Wilderness Areas have virtually invisible impact for not only non-climbers, but even for any climber who is not on the climbing route in question. And even when being "on-route" while on a climbing route, sometimes a fixed anchor can be very difficult to find. I can't imagine how such fixed equipment could impact any other NFS land user's enjoyment. On the other hand, fishermens' trails surely have visible AND environmental impact - not only for fishermen - but also for hikers in areas that they frequent near lakes and streams. Such trails may ultimately lead to trampling of vegetation and unintended "establishment" of user trails that "shouldn't" exist. In my mind, this creates much more environmental and visual impact than fixed climbing anchors and/or equipment.

The occasional fixed bolt, piton and/or sling has such importance from a climber safety perspective that the need for safety simply outweighs any possible resource impact. Without the judicious use of fixed anchors, real safety issues would arise. Maintenance and replacement needs to be managed so as to not risk elimination or removal of climbing routes. And without the freedom to make safety decisions "on the fly" (for example, replacement of a dangerous, deteriorated fixed anchor), climbers are at serious risk of injury or even death. Given that climbing is and has been a permitted NFS lands activity for decades, and that fixed anchors have been permitted for many years with no issues, it is unreasonable to complicate the fixed anchor/equipment issue further by requiring review and/or permitting, etc. Besides, as the climbing community has a very good history of anchor/equipment maintenance and replacement, climbers themselves are very good stewards. We all know and agree that maintenance of the climbing resource (that is, preservation of the very rock we are climbing on) is of extremely high importance, without which we would not have a medium to practice our activity on anyway. Of course I can't say myself what the perspective of the NFS may be regarding actual implementation of the proposed review and/or permitting policy, but I would imagine it would require yet another layer of bureaucracy, staffing, management, etc. Why manage a "problem" that doesn't exist, while climbers themselves are already expert at it?

Finally, there are also historical and economic impacts that such a policy change would create. Prohibiting fixed anchors and equipment will literally erase some of America's and the world's greatest climbing accomplishments. And without anchors, very few or no present day climbers would be attracted to such climbing areas in the first place. Also, towns near such NFS lands whose economies rely heavily on NFS lands visitors would be seriously impacted by the reduction of visitors, as they would no longer frequent such towns nor spend their dollars.

I urge you to simply allow the present policies regarding climbing and fixed anchors/equipment on NFS lands to remain in place as they are. It has served NFS lands, NFS lands users, and the climbing community well, and need not be changed.

Sincerely,

Harold A. Fleming