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First name: Jim

Last name: Holzman

Organization:

Title:

Comments: Dear Forrest Service

My name is Jim Holzman, I am a life long climber and hiker and my wife and I live in Kentucky. We are one hour from the Red River Gorge where we hike and climb all the time. I am writing concerning the Fixed Anchor Management proposals.

Fixed anchors are essential for climbers' safety and generally have little environmental or visual impact. Because, the rock itself is not endangered and the anchors are typically are not very visible high up on the cliffs. The Wilderness Act does not prohibit them nor does it list them as installations.

Prohibiting fixed anchors and requiring study and approval for their maintenance is a safety concern. Inherently, safety decisions on the cliffs are made timely as is necessary in the moment. It is not practical and potentially life threatening for this responsibility to be removed from climbers. Fixed anchor policy needs to allow for safe anchor maintenance and replacement.

Prohibiting fixed anchors in essence impedes the public from exploring our own Wilderness lands. Resource managers need to balance reasonable climbing protection for exploration, with reasonable regulation for preservation. This has been the precedent for decades, and unless and until there is measurable evidence of environmental or cultural degradation, it should be continued as such.

Prohibiting fixed anchors could over time lead to unintended loss of climbing resources. Because, if each anchor requires a study potentially taking years, land managers may determine closure to be their preferred alternative. This could threaten some of America's most historic climbs which are amongst the world's greatest climbing achievements.

I believe that it is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

Restricting the establishment of new routes to existing climbing opportunities on non-Wilderness lands would be confusing to understand and implement for both land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors. Because, intensive use of limited climbing opportunities increases climbing site impacts and creates social overcrowding. But, responsible pre-planned development of new climbing sites, can effectively alleviate these concerns by decreasing overuse of single sites, unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

I participated extensively in the mid 2000s on the Red River Gorge Limits of Acceptable Change process (LAC) as a member of the the Red River Gorge Climbers Coalition (RRGCC). The LAC was facilitated by a Danielle Boone National Forest ranger, details of LAC are available on their website at <https://www.fs.usda.gov/detail/dbnfh/home/?cid=stelprdb5346360> I believe a framework similar to it could be helpful here too.

Leaning on my participation in and understanding of the LAC process, as well as 43 years of personal climbing experience and a good knowledge of climbers' needs on the cliffs, I would like to propose the following:

Climbing management policy needs to protect existing routes from removal by grandfathering in maintenance

and replacement of existing fixed anchors to current policies. These policies have been allowing judicious use of fixed anchors while protecting Wilderness character and providing primitive and unconfined Wilderness climbing for more than a half century, until and unless:

Climbing management policy is revised to define measurable resource standards, triggering known predetermined mitigation actions, to reasonably balance resource protection with climbing (and/or other recreational uses). Such as, is accomplished in the aforementioned Daniel Boone National Forest LAC.

And additionally, these revised policies should be designed to address studies and approval for climbing anchors on a climbing site by climbing site basis. Because, site by site would be considerably more efficient than route by route let alone anchor by anchor. And, site by site would allow management decisions to account for differences in expected wilderness experience and intensity of use. Such as, the climbing experience encountered on El Cap in Yosemite, is different than that at Funk Rock City in the Red River Gorge, both of which are also different than on an Alaska Wilderness Peak. Thus each, inherently warrant differing studies and management techniques.

I appreciate the opportunity to comment, and respectfully request that any new climbing management policy not prohibited fixed anchor use

Sincerely,

Jim Holzman
Climber