

Data Submitted (UTC 11): 1/16/2024 3:46:39 AM

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Comments: I oppose this directive.

The proposal focuses on promoting "Climbing that does not rely on use and placement of fixed anchors and fixed equipment". No such climbing exists. All climbers must be prepared to place a fixed anchor in the event that weather, animals, falling rock, injuries, or other unforeseen issues force them to descend early or divert to a different route than originally planned. The allowance for fixed anchors in "an emergency involving public health or safety or other type of emergency such as a forest fire or other natural disaster" is not sufficient. What is a climber to do when faced with a personal emergency that requires immediate descent? Jump?

The proposal has a lot of language about determining when fixed anchors are appropriate. Why has USFS not already made this determination? Climbing has been occurring in US wilderness areas for almost 60 years. There is no attempt made in the proposal to explain what problem this has caused - why not? Why can't USFS first determine when and if fixed anchors are causing problems, engage with the community to come up with solutions, and then issue guidance? Again, USFS has had many decades to this, but instead proposes to suddenly change established rules with no community input and no apparent or stated reason.

I am concerned about the phrase "as funding and resources allow", used six times in the proposal. Does USFS intend to provide the necessary funding and resources to evaluate all established fixed anchors, develop the application process to place new ones, train staff on the procedures and guidelines, and maintain this program for the foreseeable future? If not, this proposal is a de facto ban on new fixed anchors, and a guarantee that existing ones will decay until they are no longer safe to use. Of course, climbers will still use them, which will result in injuries, deaths, and significant impairment of future enjoyment of wilderness areas. This regulation will only deter the volunteers that perform regular maintenance on fixed anchors to keep climbers safe. It will not deter the majority of the climbing community, who will continue to climb, and continue to use unmaintained anchors or routes that no longer have anchors.

Finally, consider what will happen when this proposal takes effect. Without fixed anchors, climbers will be forced to bushwhack their way through potentially miles of wilderness. Even a single climber doing this would be many orders of magnitude more disturbing than placing a single fixed anchor, and it would be repeated constantly by hundreds or thousands of climbers per year. The Wilderness Act of 1964 "defines wildernesses as areas that are untrammeled by people", but this proposal literally guarantees trammeling.

This draft directive is dangerous, counterproductive, and directly the Wilderness Act that it claims to be governed by. I urge the USFS to withdraw this draft, or modify it so that it does not endanger humans or wilderness. Please keep this clear order in mind: "Climbing or climbing-related activity in wilderness must be restricted or prohibited when its occurrence, continuation, or expansion would adversely impact wilderness character." This draft inarguably increases the adverse impact of climbing activity. Please reconsider.