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Comments: The Cirque Climbing gym in Lacey, Washington strongly oppose the U.S. Forest Service (USFS) draft climbing management guidance (11/17/2023). If implemented as proposed, the guidance would create significant safety issues, threaten world-class climbing routes, obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape. As climbers, fixed anchors are essential pieces of our safety system that allow us to access vertical terrain safely and sustainably. Without fixed anchors, many of the wildest and most inspiring places in America would become inaccessible to the public.

The U.S. has a long and treasured history of climbing on Federal lands, including wilderness and non-wilderness areas. In Washington State, the Washington Climbers Coalition (WCC), founded in 2004, developed an active stewardship and outreach program to promoting responsible climbing and public access on federal lands. In 2008, the WCC initiated the Washington Anchor Replacement Project to replace aging and unsafe climbing anchors. These actions have responsibly replaced thousands of climbing anchors in Washington, significantly reducing the risk to climbers.

We specifically oppose portions of the policy that regulate the replacement of existing anchors and ban the addition of new climbing anchors.

*Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

*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.

*Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

*Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

*Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

*Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

We encourage the USFS to work closely with the Access Fund to manage climbing anchors appropriately and safely on Federal lands. Thank you for the opportunity to provide comments.

Sincerely,

Mike Boyer

Founder/Owner

Cirque Climbing