

Data Submitted (UTC 11): 1/16/2024 10:52:53 PM

First name: Michael

Last name: Hogan

Organization:

Title:

Comments: In response to the updates to the Forest Service Manual's draft climbing guidance (FSM 2355 Climbing Opportunities), I agree that climbing is an appropriate use of Forest Service land and Wilderness land and applaud that the USDA Forest Service has taken this step to codify this use. I am a frequent user of National Forest Service land in North Carolina and recognize that climbing has a long tradition as a use of Forest Service land in our state. Climbers are among the most active stewards of USDA Forest Service land in North Carolina and in the southeast. I believe that the designation of fixed anchors as installations and in violation of the Wilderness Act is inappropriate and goes against the designation of climbing as an appropriate use of the land, for several reasons:

Fixed anchors are an essential piece of climbers' safety system and should not be prohibited "installations" under the Wilderness Act. Existing climbing policies allow judicious use of fixed anchors where appropriate and climbers in the region have been doing this for more than a half century. The current use of fixed anchors in necessary places protects 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. New guidance policies including a minimum requirements analysis generates additional bureaucracy and burden on land managers who are currently under-resourced.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by volunteers 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 will threaten America's rich climbing legacy and could erase the trust between climbers, climbing organizations, and land managers that has been cultivated over decades and supports maintenance of safe climbing routes. 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.