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Comments: My name is Brian Prince and I am writing you as an avid rock climber that frequently recreates in lands managed by the Forest Service. I had some concerns regarding the proposed section 2355 of the Forest Service manual that I hope you may find helpful.

I was happy to see that the proposed section acknowledges that climbing is an appropriate use of NFS lands and is also historically important in these lands (wilderness and non-wilderness). I have been lucky to climb in many national forests around the country. The climbing experiences I've had in these places are some of the best moments of my life, and I know they are for many others as well. Importantly, climbers have been recreating in forest service lands for nearly as long as some of them have been formed, and well before the Wilderness Act of 1964. Climbing was a well-known activity in wilderness areas at the time the act was passed and, in my opinion, epitomizes what the act aimed to protect, which it called a primitive and unconfined type of recreation. Having said that, I am again grateful to see language in the proposed climbing directives that acknowledges this.

However, I was saddened to see in the proposed policies a definition for climbing without the use of fixed anchors as the only form of climbing consistent with Leave No Trace principles. I find this claim (2355.03 - Policy 6a) to be completely unsubstantiated. This section goes on to mention that removable equipment, such as slings and pitons, is consistent with Leave No Trace. Slings around vegetation often have a large negative impact and are a common alternative to fixed anchors, such as bolts. Oftentimes they are the only alternative. Bolts are inert and have no impact on the environment. A ten-foot section of a hiking trail objectively leaves a bigger trace and has more environmental impact than all the fixed anchors combined in a given area. Furthermore, fixed anchors encourage travel on clean rock faces, away from crack systems (which accept removable anchors and equipment) that are often filled with vegetation and eventually become "clean" after increased traffic. Ultimately, fixed anchors are a necessary part of climbing. Even for climbing routes that mostly rely on removable equipment, fixed anchors are often needed to safely descend and are by far the best Leave No Trace option available.

I was also dismayed to read section 2355.32 which provides guidance on how to treat fixed anchors. Defining them as "installations" under the Wilderness Act is also unsubstantiated. There is no definition of installation in the act and, from my understanding, this has historically been left to interpretation. It is my opinion that fixed anchors, which climbing inherently relies on, should not be considered an installation. I think the comparison of other, larger installations (e.g. bridges, bathrooms, trails, etc.) a tiny piece of metal (i.e. fixed-anchor), invisible to all other users and which causes no environmental impact, should be reconsidered. While the proposed directives allow climbers to submit an MRA, in practice, climbers need the freedom to make in-the-moment decisions that take many factors into account such as the current weather, particular vertical terrain encountered, difficulty of the climbing, quality of the rock, etc. All of these factors, and others, simply cannot be known beforehand. Therefore, requiring an MRA for new fixed anchors would be an insurmountable hurdle in many cases. In addition, and no offense meant, but I simply can't imagine many forest service areas having the resources to evaluate all of them, as is even acknowledged in the proposed directives.

In addition, requiring an MRA to legitimize existing fixed anchors is, I believe, antithetical to the proposed statement that climbing in NFS areas is an appropriate and historically important use of the land. Likewise, the proposal that would give authority to remove fixed anchors would be a dangerous precedent. Climbers rely on the knowledge that a fixed anchor will be present. Removing a particular anchor would not only erase a part of climbing history, remove recreation opportunities for the public, but also create a safety concern.

There is also no need to require an MRA to replace existing fixed anchors. Climbers are the ones with the

knowledge and expertise to perform this community service that serves a crucial safety function. Again, the choice to replace a certain fixed anchor needs to remain up to the climber on an in-the-moment basis.

Overall, I would suggest the adoption of a more programmatic MRA that says fixed anchors are allowed in NFS wilderness and non-wilderness under certain parameters (e.g. no power drills in wilderness areas). Areas that become a problem (e.g. endangered species, important cultural sites, damaging vegetation, etc.) could be reviewed on a case-by-case basis as they are currently. The replacement of existing fixed anchors should be allowed with minimal to no review. Essentially, I encourage the adoption of a directive that maintains the 100+ year status quo under which the judicious placement and replacement of fixed anchors is allowed.

On the issue of fixed anchors outside of the wilderness, which restricts fixed anchors to "established climbing opportunities and to approved new climbing opportunities," I believe the guidance provided to be better than the guidance on wilderness areas but I sincerely hope it is also revised. I propose that a non-wilderness climbing management policy also maintain the status quo and permit fixed anchors on existing and new climbing opportunities unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

As a final thought - I believe that climbers are some of the best advocates for NFS lands and LNT principles. I believe that climbers, as a user group, appreciate and want to protect these places as much as anyone and that climbing is a legitimate form of recreation in them. Fixed anchors are a necessary part of climbing and fortunately have a negligible impact on the environment. I respectfully ask that any proposed climbing directives allow climbers to keep responsibly using fixed anchors without unnecessary regulations that many agencies don't have the resources to adopt anyway.

Thank you for your time,

Brian Prince