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Comments: The draft U.S. Forest Service (USFS) Manual 2355 proposes a reinterpretation of the long-standing USFS management of fixed climbing anchors in Wilderness and represents a substantial risk to the climbing community. The revised guidance completely reverses decades of USFS management by individual ranger districts of climbing. The draft guidance would create an unnecessary bureaucracy to manage permit applications for the use of fixed anchors in wilderness, creating a paperwork bottleneck that would likely result in extremely long wait times for permits to be reviewed given that USFS resources are already stretched thin. The draft specifically states (section 2355.21, first sentence) that the USFS would develop climbing management plans "as funding and resources allow". Given that the USFS is already understaffed to meet the needs of many land management tasks it is likely that climbing management would be pushed to the side, rarely to be included in the planning process. Additionally, the proposal seems out of character with how the climbing community and the NPS have collaborated on climbing management in wilderness areas for nearly 60 years. Specifically, the proposed guidance mentions the use of power drills, which are generally not used in the wilderness to maintain an atmosphere consistent with the Wilderness Act. Additionally, the draft manual appears to promote the use of pitons instead of anchor bolts (2355.03.6). These are used in the most rare of scenarios in wilderness climbing, and the climbing community made a change as a whole to stop the common use of pitons almost 50 years ago. This shows a lack of understanding about modern climbing methods, as bolts cause much less damage to the rock and less visual impact than nearly all pitons. Instances such as this illustrate that the proposed guidance is out of touch with the reality of how most wilderness climbing areas are used and managed. Finally, the proposal creates a convoluted system of bureaucracy for climbing management plans that delegates authority to multiple positions (forest supervisors, district rangers) that would create both general confusion and a lack of accountability for the definition of climbing management plans.

The Wilderness Act defines wilderness as "as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain". This description is perfectly fitting for many of the world-class climbing areas that are on wilderness land managed by the USFS in my home state of Colorado. Examples include Lost Creek, Mount Blue Sky (formerly Mount Evans), Sangre de Cristo, and the Hunter-Fryingpan. These areas range in climbing character from single pitch sport climbs to multi-pitch mostly traditional climbs up 14,000 ft. peaks. I have spent the past few years climbing in these areas and many other Wilderness areas around the country. These areas provide incredible opportunities to interact with nature and enjoy pristine landscapes, just as the Wilderness Act intended. Without the use of fixed anchors to provide safe rappel and belay stations, and without some protection bolts, many of the routes in these areas would become much more dangerous.

I urge the U.S. Forest Service not to enact the guidance described in Manual 2355. This proposal sets out to fix to a problem that does not exist. Adding layers of bureaucracy to the status quo of collaborative management of individual wilderness climbing areas by experienced individual land managers would place an undue burden on the climbing community and remove recreational opportunities from thousands of devoted climbers.