

Data Submitted (UTC 11): 1/22/2024 6:34:20 PM

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Comments: Dear USFS,

First, thank you for the invaluable work you do to preserve our nation's natural heritage and make it accessible for enjoyment by the public. I know from personal experience as a conservation professional working alongside USFS staff across many FS units how much hard work, thought, planning, and care goes into your daily efforts.

I'm writing to urge you to reconsider adoption of the proposed "FSM 2355 Climbing Opportunities #ORMS-3524" addition to the Forest Service Manual. As a longtime recreational climber, I echo the concerns voiced by the Access Fund and other climber advocacy organizations about this proposed directive. Specifically, I agree with the Access Fund that:

1) 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.

2) 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.

3) 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.

4) 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.

5) 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.

6) 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.

Additionally, I urge you to consider the parallels between fixed anchors and trails. Trails facilitate safe access to natural areas while concentrating user impacts to preserve more land in a near-pristine condition. They are also a fully accepted intervention in the environments managed by the USFS. Fixed anchors function in almost exactly the same way, but in vertical terrain. The other difference is that fixed anchors are much, much less intrusive than any trail, both visually and in terms of their physical impacts. Unlike trails, fixed anchors: are almost invisible; require little or no disruption to the surrounding environment to install; and require far less frequent and intensive maintenance. We should think of fixed anchors as a more Leave-No-Trace version of trails that simply extend into vertical terrain.

Thank you for your consideration of this and the many other comments I'm sure you have received expressing concern regarding the "FSM 2355 Climbing Opportunities #ORMS-3524" proposal. Please rethink the adoption of this directive.

Best,
Tim Spenser