

Data Submitted (UTC 11): 1/23/2024 6:52:04 PM

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Comments: As a climber of 25 years, I have traveled extensively throughout the western US and climbed in many National Forest lands, often in designated Wilderness. The proposed policy changes to climbing management in USFS managed Wilderness zones is deeply concerning for many reasons. Foremost, it directly opposes Wilderness climbing management that has existed since the passage of the Wilderness Act, in deeming fixed anchors "installations" and severely restricting their future use. Fixed anchors of all manner have been utilized judiciously and in limited capacity by climbers in Wilderness since before the Wilderness Act was passed, and continue to be crucial for allowing climbing to occur on these public lands. The use of fixed anchors has always had restrictions to non-motorized placement (specific to bolts) to be compatible with the provisions of the Wilderness designation. Climbers have always been the responsible agents for maintaining or updating existing fixed anchors to ensure safety and reduce potential accidents/fatalities that could occur if these anchors are not routinely inspected and replaced. Very few of America's Wilderness rock climbs could safely be ascended and descended without fixed anchors, placed by climbers and maintained by climbers. The current proposal if taken to the full extent of its measures could effectively end safe Wilderness climbing opportunity for a large portion of the existing routes within Wilderness. It also will severely restrict any future exploration of our public lands by climbers.

Implementation and enforcement of these proposed changes seems completely out of the realistic scope of USFS management in many of the parks with designated Wilderness climbing. Safety of citizens attempting to recreate in their public lands, as they have for decades under the currently existing Wilderness management, will become a major issue. Fixed anchors are necessary on the vast majority of routes they currently exist, and the ability to maintain them appropriately is crucial for continued safety. Liability for anchor related failures does not currently fall upon governing agencies, but restriction of fixed anchors for safe ascent/descent and maintenance of existing anchors places this liability for safety squarely upon the agency.

Evaluation of all existing fixed anchors and of potential future fixed anchors is also not realistically within the scope of USFS management in most National Parks. By definition, these routes often lie in wild settings, and will not be easily accessed or assessed by USFS personnel. This new proposal places significant burden upon the agencies managing these lands, and historically, such oversight is not practically feasible for the agency.

Funding and staffing are simply not adequate to impose such undue management burden upon already overstressed agencies that have many complex user concerns to continually address.

Furthermore, proposing that non-Wilderness USFS lands have fixed anchor use limited to existing climbing opportunities and subject to review by the agency is impractical for reasons already listed. Restricting fixed anchor use on these lands poses all of the major problems listed above, and further compounds the burden of responsibility placed upon the agency, as non-Wilderness USFS lands account for a significant portion of America's rock climbing sites, but existing and future potential. I have personally watched in dismay as the temporary moratorium on new fixed anchors in the Bighorn National Forest has lasted 4.5 years, as the agency has struggled to come to a realistic plan for the level of oversight that is not feasible. I have little doubt that federal level oversight on millions of acres nationwide will pose that much more of a problem to address, if the language of this new management is followed strictly.

Please, keep America's Wilderness climbing wild, safe, and viable for the millions of citizens that recreate annually on these public lands and the future of climbing as an activity that can occur within the Wilderness!