Data Submitted (UTC 11): 1/24/2024 7:45:51 PM First name: Karen Last name: Kovaka Organization:

Title:

Comments: I write to express my strong disapproval of this project! I am extremely concerned about the safety issues that this proposed directive will create. As I read it, this directive will create a situation where the default on USFS land is that fixed anchors and other climbing equipment can neither be placed or replaced. Yes, this default can be overridden by a minimum requirements analysis, but this is a time consuming process and is incompatible with the in-the-moment decisions that climbers must make in order to keep themselves safe.

I'm sure you've heard from many climbing organizations and individual climbers, but let me add my voice to theirs: fixed anchors' are an essential piece of climbers' safety system. Absolutely essential. There is also no reason to see fixed gear as somehow in tension with wilderness character. Fixed gear is like a well-maintained trail: it enhances enjoyment of wilderness, keeps people safe, and reduces unwanted impact. In the absence of fixed gear, or in cases where fixed gear cannot be maintained and therefore cannot be trusted to keep climbers safe, people will (a) not go climbing any more, (b) get into dangerous situations, which will stress SAR capabilities, or (c) do things that degrade wilderness, such as rapelling off of trees and bushes, which is bad for vegetation. None of these outcomes are desirable, either for climbers or for land managers. Please reconsider this proposed directive, as it will not have its intended effects and will likely jeopardize lives instead.