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Comments: Dear USFS:

I have been an active climber and mountaineer for over 50 years - enjoying Wilderness Areas both before and after their designation. I find the proposed regulations to be over-reaching, difficult to manage and enforce, and unsafe. I agree that use of the wilderness has increased dramatically in the past 10-20 years and am supportive of trailhead traffic limitations, closures of damaged areas to allow for restoration, and other measures that the Forest Service has taken when and where needed. I am not in favor of a prohibition on the installation or replacement of fixed anchors.

Technical climbing in the American wilderness is approaching it's hundredth anniversary. This activity is one of the historic uses of the national parks, national forests, and wilderness areas. Climbing and the judicious use of fixed anchors is much less damaging to plant life, water quality and the wilderness experience than the stock animals that are allowed as part of the historic use of the wilderness. Climbing is also an important gateway through which younger generations and urban dwellers make their first connection with the value of wilderness and the importance of stewardship.

Fixed anchors are used when climbs and belay stations cannot be adequately protected with natural protection. The prohibition of bolts or replacement of webbing on other types of fixed anchors reduces a climber's ability to make in-the-moment safety decisions. The proposed process for applications and conducting minimum requirements analysis was developed for implementation of improvement projects in wilderness (trail maintenance, campsites, water supplies, sanitation facilities, etc.) not for the minimal safety practices of mountaineering.

Instead of applying a cumbersome process developed to evaluate construction or maintenance projects, I would encourage the Forest Service to establish best management practices and partner with the American Alpine Club, Access Fund, and other regional climbing interest groups to provide education to the climbing community about all aspects of minimal impact climbing. I believe that would achieve the Forest Service goals more effectively and collaboratively than the proposed regulations.

Thank you.

Jim Graydon
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