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First name: Gregory

Last name: Barnes

Organization:

Title:

Comments: These proposed directives are basically a ban on rock climbing. Despite saying at the start that "Climbing has long been an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character of many NFS wilderness areas", these proposed directives would make an essential tool of climbing - the fixed anchor - illegal without prior approval. This is ridiculous - fixed anchors are required for nearly all climbing routes. This is like saying backpacking is still allowed, but boots, backpacks, and water bottles are not permitted.

The Wilderness Act never intended for small and "substantially unnoticeable" climbing fixed anchors to be considered as "installations." Installations are roads, buildings, dams, power lines, tramways, and similar. Climbing anchors are tiny, hard to find (even when climbing a route), and this is a radical new reinterpretation that would amount to a full ban on climbing. Climbing new terrain in the mountains is exactly the sort of "primitive and unconfined" recreation that the Wilderness Act is supposed to protect.

This interpretation of the term "installation" violates both the intent, and the letter, of the Wilderness Act. And then the same logic is used for USFS lands that are not designated Wilderness. Clearly, the idea here is to ban climbing unless approved, which is trying to eliminate exactly the sort of primitive and unconfined recreation that the Wilderness Act is supposed to protect. Again, fixed anchors are required for safe movement in the vertical world, and are simply too small to be considered installations.

Due to the design of these proposed directives, individual land managers would hold enormous sway over rock climbing. At a mere whim of a single un-elected manager, entire regions of USFS land could be closed to climbing. Imagine the outcry if a manager could suddenly close all hiking trails in their district.

Over the past 30 years I have done dozens of new routes on USFS lands, and while a good portion required no fixed anchors at all during the ascent, most required at least a few fixed anchors in order to descend (with my routes, these were slings around trees, fixed nuts, and bolts). Others required protection bolts and occasional pitons for ascent, since there were no natural gear options.

To explore in the vertical world in a primitive and unconfined way (namely starting at the ground and climbing up), fixed anchors cannot require prior authorization, since climbers do not know what will be needed until climbing. I have climbed new routes up to 750' tall with zero fixed anchors, and others of that length needed dozens. There's no way to know until you climb the route, and requiring prior approval is a true ban on climbing.

Replacing older, deteriorating climbing fixed anchors should never be prohibited - this is like saying that hikers must use a bridge over an impassable river, but even if it's about to fall down, it can not be maintained. It is the height of government arrogance to prohibit climbers from safely maintaining gear that is essential for climbing. I guess the logic is that if the fixed anchors get too old, then climbers will start to break them and get hurt or killed, and then climbers will stop climbing the routes?

The USFS already has plenty of ways of regulating climbing, and this method of "banning all climbing unless allowed" is basically a comprehensive elimination of one of the most iconic forms of Wilderness recreation. Climbers have worked with the USFS for decades both to self-regulate, and work with official regulations, around raptor protection, cultural resources, and other natural resource concerns. All of these tools are already available to the USFS. Why is there an attempt to eliminate climbing entirely by focusing on one essential tool for navigating the vertical world?

Please do not ban climbing through what is basically a legal technicality (which is wrong to begin with). It is a new, radical, misinterpretation of the Wilderness Act, and then used as an excuse to also apply to all USFS lands.

Sincerely,

Gregory Barnes
Boulder, Colorado