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Comments: To the U.S. Forest Service:

I have been a climber for 30 years and regularly rely on fixed anchors while climbing on my personal time and while working as a professional in the mountains. For the past 24 years I have worked as a mountain climbing guide, avalanche forecaster, and glaciologist in U.S. Parks such as Glacier, Mount Rainier, Denali, and the North Cascades, and in National Forest Wilderness Areas in Washington, Montana, and Wyoming. I am writing to express my deep concerns regarding the recent Forest Service Manual 2300 - Recreation, Wilderness, and Related Resource Management Chapter 2350 - Trail, River, and Similar Recreation Opportunities.

Fixed anchors are critical for safety. These proposed regulations are unnecessary and based on a new and questionable interpretation of the Wilderness Act. If these restrictions take effect, climbers will be placed at greater risk and their ability to climb on public lands will be substantially limited.

It is unfortunate that the agency did not consult more thoroughly with the American climbing community prior to drafting this document. The proponents of these regulations simply do not understand how fixed anchors are commonly used. For example, the key differences between fixed anchors placed only at belay/rappe stations versus those placed for intermediate protection are not even addressed. The type and number of fixed anchors on any given climb can vary greatly depending on this primary distinction.

These directives do mention, "bolt intensive climbing opportunities..." as an example of what is not consistent with wilderness character. But this proposal does not intend to regulate only the heavy use of bolts. Instead, it treats ALL fixed anchors in the same way, and that is prohibited until proven necessary by the time-consuming Minimum Requirement Analysis. This is an unwarranted regulatory approach and demonstrates a limited understanding of modern climbing practices. It also shows a concerning lack of trust towards the climbing community. The agency must first reach out to climbers and reputable climbing organizations such as the American Alpine Club, the Access Fund, and the American Mountain Guides Association to better understand the need for fixed anchors. In doing so, they will also learn that many climbers already possess a strong ethic for minimizing fixed anchors in wilderness areas and parks.

Downclimbing is often more difficult and dangerous than climbing up and in many cases, it is impossible to downclimb a route. In these situations, the only safe way to descend is to rappel which necessitates a fixed anchor. It is completely unreasonable to require a time-consuming permitting process for all fixed anchor placements. Climbing is a dynamic activity, and it will be impossible to always know when, where, and what type of fixed anchor will be needed before someone starts a climb. Emergency situations sometimes arise, and climbers should have the right to decide how to best protect themselves while they are out in the terrain. This is critical for effective risk management.

The recommendation for Forests to develop climbing management plans has merit. But the proper course of action would be to complete these plans before there is any discussion about prohibiting fixed anchors. It will likely take years to finish these plans, and during the process many land managers and members of the public would realize that prohibiting fixed anchors is unjustified. The proposal as it stands, is biased against climbers as a user group. It appears to be an attempt to set a precedent before the climbing community can organize and have a louder voice in the debate. Climbers and land managers must first work together, understand each other's perspectives, and build consensus. A critical first step would be for climbers to clarify how fixed anchors are used to provide proper security. A second, but equally important step, would be to objectively assess the actual impacts of fixed anchors on the natural resource. This proposal is inadequate regarding the first step and does

not even really address the second.

These directives are based on a narrow interpretation of the Wilderness Act. The language in this Act is highly subjective and concepts such as natural, untrammelled, and undeveloped are not universally considered in the same way by all people. It is inappropriate to simply decide after decades of successful climbing management that all fixed anchors are now prohibited installations. These new regulations will make climbing more dangerous. Meanwhile, the reasoning behind these directives is suspect and murky. The primary argument centers on defending a vague idealism of wilderness character rather than addressing any actual impacts on the landscape. There is no clear explanation for how these restrictions will protect the resource. The only purpose provided is that one may argue that fixed anchors should be considered installations and therefore the agency should regulate them as such. It is wrong to impose such severe and sweeping restrictions on an entire user group based on this disputable and new interpretation of the Wilderness Act.

Historically climbers have been some of the greatest advocates of Parks and Wilderness Areas in U.S history. We still are for the most part. In the three decades I've spent in the mountains, including putting up first ascents, guiding clients, or performing rescues, I have always done my best to minimize my impact on the land. I strive to minimize any fixed anchors in wilderness areas and primarily rely on them only for descent. I often remove and pack out aged and un-serviceable slings from rappel anchors to clean up the mountains. Many of my fellow climbers share this same ethic. With few unfortunate exceptions, the U.S. climbing community has done an admiral job of policing itself and acting as good stewards of the land. Our National Forests do not need these proposed regulations. Please let us work together to develop sound and sensible policies that are safe for climbers.

Thank you,