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Comments: To Whom It May Concern -

I am writing to express my concern and opposition to the recent draft recreation management directive that proposes classifying fixed anchors as prohibited "installations" in Wilderness areas. This decision overlooks the long-standing, positive relationship between the Southern Arizona climbing community and the Coronado National Forest (CNF), as well as the established acceptance and celebration of rock climbing in National Forests and public lands across the country.

For decades, the Southern Arizona climbing community, specifically the Climbing Association of Southern Arizona (CASA) has actively collaborated with the Coronado National Forest to enhance and steward climbing areas. This includes substantial volunteer efforts in system trail maintenance, climbing area erosion control, litter cleanup, graffiti removal, and crucially, fixed anchor maintenance. This collaboration extends beyond climbers, drawing on resources from local businesses and non-climbing organizations. Recognizing this history of positive engagement, it's imperative to consider the extensive community investment in these stewardship efforts.

Rock climbing is not just a recreational activity but an integral part of the CNF experience, celebrated on its homepage as a major forest activity. Additionally, the website names the Climbing Association of Southern Arizona (CASA) as an "official partner" of the CNF.

While I understand the desire of land managers to preserve the character of Wilderness areas, this proposal appears to offer conflicting language regarding the impact of these fixed anchors and of climbing activity, while simultaneously acknowledging that: "climbing, including the use of fixed anchors and fixed equipment, can fulfill important wilderness recreational purposes and can help preserve wilderness character by providing opportunities for primitive or unconfined recreation."

Additionally, the proposed directives seem to disregard the fact that fixed anchors are a critical component of a climber's safety system and have been in use since before the 1964 Wilderness Act. Existing policies have allowed for the judicious use of these anchors for over half a century, effectively balancing wilderness preservation with safe and primitive climbing experiences.

Implementing a blanket prohibition on fixed anchors raises significant safety concerns. It impedes the regular maintenance of these anchors - a responsibility diligently undertaken by the climbing community. Furthermore, the policy threatens to erase vital parts of America's rich climbing legacy, including routes established well before the Wilderness Act.

Additionally, the proposed restriction on establishing new routes to "existing climbing opportunities" on non-Wilderness lands is not only unenforceable but also likely to sow confusion among both land managers and climbers. It is critical that non-Wilderness climbing management policies maintain opportunities for new anchors, with restrictions applied only when necessary to protect cultural and natural resources.

It's also important to note that these rule changes come with no attached funding mechanism, placing an unsustainable management burden on the already stretched-thin Forest Service staff.

In light of these considerations, I strongly urge the US Forest Service to recognize existing fixed anchors, both in and outside of wilderness areas, as approved and appropriate until a thorough resource analysis is conducted for each anchor. Moreover, it is essential for the USFS to engage actively with the local climbing community, specifically CASA, who play a crucial role in maintaining climber safety and promoting sustainable outdoor

recreation.

Again, I empathize with the difficult decisions made every day by USFS staff. The USFS are tasked with the near-impossible job of balancing the needs of a myriad of public land users, outdoor recreation enthusiasts, and the pristine and delicate environment and ecosystems of wilderness and Wilderness areas. However, I strongly and emphatically believe that a decision to significantly restrict the use of fixed anchors in these areas will not only not improve or preserve Wilderness character, but will put the safety of outdoor climbers and other land users at significant risk.

On a personal note, this draft proposal is of great concern to me; I am an avid outdoor recreational enthusiast. As a rock climber and resident of Tucson, AZ, I feel incredibly lucky to have a vast landscape of natural beauty in our backyard. Climbing areas on Mt. Lemmon, Mt. Wrightson, and in the Rincon Mountains represent significant the sort of access nature that dramatically improves the quality of our lives, are a significant driver of local economic activity, and perhaps most importantly: serve as natural ambassadors for public interest and engagement in the sustainable preservation of our most treasured public lands.

Thank you for considering these points in your decision-making process regarding the management of fixed anchors in Wilderness areas. I hope for a resolution that acknowledges the historical, cultural, and safety aspects of climbing in our cherished natural landscapes.

Sincerely,  
Seth Kohler