

Data Submitted (UTC 11): 1/29/2024 1:36:36 PM

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Comments: Comments of Proposed Forest Service Policy Regarding Fixed Anchors in Wilderness

I am writing to express my concern over the proposed US Forest Service guidance regarding fixed anchors in wilderness areas. The proposed, unnecessary, interpretation of fixed anchors as 'installations' could make much of the established and potential climbing that exists in wilderness areas effectively impractical and dangerous. Such an outcome would be at odds with the current interpretation of the Wilderness Act, which recognizes and encourages climbing as a permitted activity, which historically in many areas - for example Yosemite - predates the passing of the Wilderness Act.

Over the last 30 years I have personally climbed in many of the areas that would be affected by the proposed changes in guidance; including but not limited to Yosemite, the Sierras, Joshua Tree, Rocky Mountain National Park, Granite Mountain, the Wind Rivers, Old Rag and the Linville Gorge. My experience of adventure climbing and wilderness has been assisted and enhanced by occasional fixed anchors, often in the context of permitting safe descents.

Existing Forest Service policy has allowed the limited use of fixed anchors for ascent and descent in Wilderness areas that are under Forest Service management. The climbing population has respected this, and this policy has been successful in allowing climbing to flourish in Wilderness areas. There has been no proliferation of bolted sport routes in Wilderness areas, and the bolts that have been placed have usually been hand drilled. The climbing community believes that the existing Forest Service policy has been very successful in allowing exploratory climbing as well as the repeats of established routes, while preserving the wilderness status of these areas.

Observations from a climber's perspective:

\*Fixed anchors are not prohibited "installations" under the Wilderness Act and there is no need to class these as such;

\*It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for many years;

\*Fixed anchors are an essential piece of the climbers' safety system and prohibiting fixed anchors will create safety issues, and hinder the regular maintenance of existing anchors;

\*Retaining existing climbing policies allowing the limited use of fixed anchors will preserve Wilderness character while providing for primitive and unconfined climbing;

\*Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal;

\*If the draft directives are adopted, it is also likely that prohibitions on fixed anchors will be extended to non-wilderness areas through Climbing Management Plans, for reasons of bureaucratic standardization to ease the effort of administration. There is no need to apply policies - whether existing or proposed - that have been developed for Wilderness areas to non-wilderness areas.

\*The Forest Service has proposed restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands. This is likely to be unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new routes and new fixed anchors unless, and until, analyses determine that climbing in specific areas should be restricted to protect cultural and natural resources.

In summary, the proposed changes in Forest Service policy concerning fixed anchors in wilderness are

unnecessary and should be reconsidered. The existing policy of allowing limited placement of fixed anchors is perfectly adequate and allows the Forest Service to balance the provision and encouragement of recreation activities such as climbing with the preservation of the special nature of Wilderness areas.

Thank you for the opportunity to comment.