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Comments: I am writing to oppose the US Forest Service's proposed directive to add a new section, 2355 to Forest Service Manual (FSM) 2300. The proposed directive attempts to characterize fixed anchors as installations under the Wilderness Act and will significantly reduce climbing on federal lands.

Climbers' use of fixed anchors predates the 1964 Wilderness Act and later laws establishing wilderness areas. Legislators were quite aware of climbers' use of fixed anchors when the Act and later laws were passed and their intentional omission of any provision regulating fixed anchors recognizes the necessity of fixed anchor use for climbing and confirms its acceptability under the Act.

This new proposed directive ignores the legislative intent and history behind the 1964 Wilderness Act and misconstrues the term "installation". The Act makes clear that the term "installation" was intended to apply only to large scale structures. Fixed anchors, which are miniscule in size and are not visible to anyone but a climber on a climb, are clearly well outside the scope of the term "installation" as described in the Act:

"(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area."

The result of this attempt to redefine and prohibit fixed anchors as "installations" and creating a lengthy and cumbersome Minimum Requirements Analysis process will be to significantly reduce climbing on USFS federal lands.

While the directive purports to have an application process that might theoretically approve a fixed anchor, as a practical matter, 99% of all climbers have never placed and will never place fixed hardware. Although all climbers use fixed hardware that is in place, it is difficult, time consuming, and hard, physical work to place or replace fixed hardware. Few climbers are willing to provide this service. The effect of the proposed directive will be that very few applications will be received to replace fixed anchors and fixed anchors on classic climbs will soon deteriorate and fail.

Without fixed anchors for protection, climbers will face serious injury or death while attempting classic climbs that had been enjoyed by thousands of climbers in the past and which had been safely protected by fixed anchors. Without fixed anchors available for descent, it will no longer be possible for climbers to safely descend from the summit or safely retreat in the face of a life threatening storm. The proposed directive needlessly puts the lives of these climbers at risk.

The use of fixed anchors is an integral part of safe climbing in all of its variations, including mountaineering, alpine climbing, rock climbing, and ice climbing. A review of fixed anchors in land managed by the NPS, USFS, BLM and countless state agencies over the past 40 years confirms that fixed anchors have continuously been permitted and that management plans have successfully addressed land manager's concerns while allowing climbers to safely climb on federal lands.

There is no reasonable need for this ill-conceived and poorly considered directive, especially when the existing system is functioning quite well.

