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Comments: I am writing to express my concerns regarding FSM 2355 Climbing Opportunities #ORMS-3524.

First, however, I applaud the agency for recognizing that climbing is an appropriate activity in the wilderness and that it provides outstanding opportunities for primitive and unconfined recreation. I have hiked, backpacked, explored, and climbed extensively in wilderness areas all throughout the western U.S., and feel strongly that my climbing experiences—even those that involve a small number of fixed anchors—are every bit as primitive and unconfined as those other modes of exploring and experiencing the wild. While I agree that "bolt-intensive" climbs are not appropriate in wilderness, climbing unequivocally belongs in wilderness. Opponents of climbing in wilderness like to claim that only 3% of the country's climbing occurs in wilderness, but regardless of whether this is true, some of the country's most iconic climbs, most of which utilize a small number of fixed anchors only as a last resort, are located in wilderness areas. The vast majority of my personal climbing has not been in wilderness, but most of my most meaningful climbing experiences have been.

My concern is that the draft directive prescribes a complicated, cumbersome, and unnecessary bureaucratic approach to managing fixed anchors in wilderness, one that empowers land managers who either do not understand climbing, do not prioritize it, or who are actively anti-climbing, to simply ban the placement of fixed anchors altogether, effectively banning the vast majority of climbing routes. Federal agencies—even well-meaning ones—often find themselves strapped for cash. Without the resources to perform MRAs, my concern is that it is far easier for land managers to simply issue what amount to indefinite climbing bans, while planning to deal with the issue at a later date that never comes. There are, indeed, numerous historical examples of agencies and specific units issuing directives to implement policies or procedures that are never finalized. It is much easier to simply prohibit that to actively and carefully manage.

Yet none of this is necessary. Treating fixed anchors as "installations" flies in the face of over 60 years of land management pursuant to the Wilderness Act. The Act already bans power drills, effectively limiting "bolt-intensive" climbs, considering how time and labor-intensive it is to place bolts by hand. Moreover, to the extent that there are rare instances of inappropriate bolt-intensive climbs despite the ban on power drills, the agency is already empowered to act in order to protect natural and cultural resources.

I would also like to note that lumping other types of removable equipment together with bolts is inappropriate and counterproductive. I see no guidance in the draft directive regarding climbers who must leave slings or other types of removable equipment behind in emergency situations, such as the need to bail from a route in a storm. This could happen on any route. Even if bolts are to be considered installations, such removable equipment is, by contrast, temporary and easily removed by the next climber to ascend the route and does not fit the definition of an installation.

Finally, to the extent that the document also references restrictions of new routes on non-Wilderness lands, this is inappropriate, unenforceable, and will create confusion among land managers and climbers. New anchors are appropriate in non-wilderness areas unless specific concerns regarding natural or cultural resources are raised and addressed. No new procedures are necessary to address any such concerns in non-wilderness areas.

Thank you for taking the time to consider my comments.