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Comments: Dear United States Forest Service:

I have been climbing for eighteen years and am a board member of the American Alpine Club. I have been the Managing Director of the Yosemite Climbing Association and I am also a California-licensed attorney.

I am deeply concerned about the United States Forest Service (USFS) draft guidance regarding fixed anchors on Wilderness. While I understand the desire to manage climbers' placement of fixed gear on Wilderness, the guidance as it is drafted poses three grave issues.

First, having worked closely with administrators of federal land in the West, I believe the Minimum Requirements Analysis (MRA) process proposed for bolts and fixed anchors will put an insurmountable resource burden on agencies and departments that already experience challenges related to constraints. Many areas where there is Wilderness climbing do not have climbing management plans or the resources within administration intimately familiar with climbing, who have the expertise to implement and carry out MRAs. The draft guidance proposes no timeline within which MRAs should be completed and very little direct guidance around how they should be carried out vis-à-vis climbing. I am also concerned the MRA process will not be conducted consistently between managed areas, which will create confusion and frustration for both climbers and land managers.

Second, in some areas, MRAs may result in a de facto ban, which is counter to the interpretation of the Wilderness Act within which climbing is an appropriate use of Wilderness. Due to the lack of clarity around timelines for MRAs and how they should be conducted vis-à-vis climbing, it is not unreasonable to imagine some permit processes taking months and years, which considering weather, fitness, and other temporary conditions required for certain climbing routes, would essentially prohibit the anticipated climbing. This would result in a prohibition of a recognized appropriate use of Wilderness.

Third, the guidance will strain relationships between land managers and climbers. In recent years, land managers have worked alongside climbers to manage local issues effectively. This hasn't always been the case. Local and national climbing organizations as well as key relationship stakeholders at Department of Interior (DOI) agencies have partnered in key climbing areas to promote open communication between climbers and land managers. If the guidance is implemented as drafted, the confusion I believe will follow from inconsistent enforcement will frustrate the ease with which all parties work together.

Fourth, the draft guidance is largely unenforceable. If the objective of the USFS is to minimize bolt placement in Wilderness or to manage it in a different way, the guidance as proposed will not accomplish that aim because climbers in remote Wilderness will continue to place bolts and fixed gear with the knowledge the USFS does not have an adequate number of climbing rangers to enforce the prohibition. This is especially true regarding the unreasonable prohibition of new route development.

My alternate proposal is that the DOI work with national climbing organizations to develop a sustainable and reasonable plan to address the underlying concerns prompting the proposal of guidance that seems unreasonable.

Thank you for your consideration.