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Organization:

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Comments: I am writing to express my deep concern regarding the proposed Forest Service Manual (FSM) Chapter 2355 Climbing Directives as worded. Specifically, I am concerned about the new classification of climbing anchors and equipment as "installations" for purposes of section 4(c) of the Wilderness Act (FSM 2355.32, Paragraph 1) and the fact that the placement, replacement, and retention of these will be subject to a "Minimum Requirements Analysis" to determine whether they are the minimum necessary for administration of the area in accordance with the Wilderness Act of 1964. I will note that in the past 60 years since passage of the Wilderness Act, climbing anchors have NOT been considered fixed installations, and see no reason for that to change.

My main worry is that of climber safety. I don't see that the Forest Service has the funding and resources necessary to perform the Minimum Requirements Analyses (MRAs) that will be required even to review existing anchor replacement, much less to review potential new anchor placement. Climbing anchors and equipment prevent climbing deaths! More and more climbers are heading outside to climb, and they need to be able to climb safely. With millions\* of fixed anchors already in existence, these need to be maintained expeditiously, and I believe that subjecting all of these to MRAs will be impractical and unable to be implemented. I am afraid then that without the proposed required MRAs, it will become de-facto illegal to replace bad anchors or to install new anchors (even to leave slings and rap rings at a climb). And what can follow is that climbers head to climb somewhere, perhaps trusting that the anchors and equipment there will be okay, when in reality the equipment is unsafe and can lead to death or serious injury if trusted.

I refer to my own experience as a climber of 27 years in Southern Arizona when I suggest that climbers are a group of people who are incredibly invested in preserving "wilderness values" and in stewardship of public lands. Local climbing organizations (LCOs) such as ours (CASA - the Climbing Association of Southern Arizona) have developed and maintained close ties with forest land managers to perform activities that affect the general NFS visitor, such as litter cleanup, graffiti removal, trail maintenance, and raptor monitoring, but also we have specifically handled climbing-related activities such as anchor maintenance and climbing area erosion control work. The USFS needs to partner with local climbing organizations to manage climbing areas. It is these organizations which are truly invested in providing safe experiences for climbers, and who are knowledgeable and committed to maintaining access to climbs. It is these organizations that will handle the expense and provide the expertise to ensure anchor safety.

Finally, I submit that the climbing community in the United States is a group of persons that are fully committed to preserving wilderness values and careful stewardship of public lands, and that this community can provide the funding, time, and expertise necessary for anchor maintenance, and that subjecting climbing anchors to MRAs overseen by an already stressed and underfunded government organization, carte blanche, can only be a recipe for death, and hence, disaster.

Please reject the classification of climbing anchors as "prohibited installations."

Sincerely,

Abigail Stocks (Tucson, AZ)

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\* Mountain Project (<https://www.mountainproject.com>) maintains an online database of climbs in the US, which is by no means comprehensive. While not all of the climbs listed are on NFS lands, it currently notes 303,425 shared routes. Minimally guessing 10 anchors per route suggests that there are over 3 million anchors out there

- and again, many climbs are not even captured in the database.