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Comments: I have been fortunate to climb in many Wilderness areas around the country including Linville Gorge, RMNP, Black Canyon, Zion, and John Muir to name a few. These experiences, exploring the vertical environment in a pristine setting, are core to my love of rock climbing and public land in this country. These experiences, that were facilitated by the presence of fixed anchors, have put me on a path where I routinely advocate for and work to protect these special places in my personal and professional life. While I have many qualms with this proposed guidance, the thing I keep coming back to is the wedge this will drive between climbers-and more broadly the human-powered recreation community-and the conservation community. So many public lands have received a protected status, been defended, or seen investments in stewardship thanks to the work of the climbing community. Even the Wilderness Act itself would have been unlikely to succeed if not for support from climbers such as David Brower. I fear that this guidance, and the mis-use of the Wilderness Act will undermine that relationship and ostracize climbers. Federal land managers are already so under-resourced to complete the tasks asked of them. The thought of weakening that relationship gives me a dim outlook on the status of public lands in this country and makes meaningful, critical conservation work that much harder for everyone. I hope you consider these implications when you think about the actual implementation of this policy.

As to the specifics of this proposed policy, fundamentally I believe this new interpretation of the Wilderness Act to include fixed anchors as installations is incorrect. It is inconsistent with the intent of the law, contradictory to 60 years on interpretation, and even contradictory with existing internal guidance (for NPS, see DO. 41). While I understand this new desire to have a more hands on approach to climbing management, trying to use the Wilderness Act in this way is inappropriate. As a federal agency you are afforded many more nuanced ways to manage recreation, including climbing, on Wilderness areas you administer. Myself, and many other climbers are open and understanding to new management strategies to protect natural resources and wilderness character, but you should use appropriate tools and agency power to accomplish this.

The implications of this policy are obvious and well documented by organizations like the Access Fund. Short (emergency descent) and long term (fixed anchor maintenance/replacement) safety concerns, unnecessary resource damage, unenforceable policy, waste of taxpayer money, etc. are what lay ahead of you on this current path.

Of particular note is the fiscal irresponsibility of this draft policy. This policy comes with no additional funding allocation and will just fall in line behind the massive maintenance backlog. Individual park managers and forest supervisors are already unable to show up in meaningful ways to contribute to Climbing Management Plan processes at so many locations. To think that the funding and staff resources will be in place to implement and enforce this policy is foolish.

The current and long running interpretation of fixed anchors as non-installations in Wilderness has served the public well over 60 years. I urge you to continue working through that framework and strengthen your partnership with the climbing community to enact appropriate climbing management policies that are realistic and effective.

Since the USFS is trying to include non-Wilderness climbing guidance in the draft policy, the next statements are specific to that:

I applaud the USFS considering national level guidance for climbing management as it is something that has been recommended by the climbing community for over 30 years. Unfortunately, the language in this draft policy falls well short of the mark and quite honestly shows a lack of understanding of the sport of rock climbing. This confusing, and effectively unenforceable policy needs serious revisions to be useful and understandable by forest

supervisors. A blanket restriction on new "climbing opportunities" at this level is bad policy. That decision should be made by individual units through a general management plan updates or a Climbing Management Plan. A national policy should have clear, high level guidance on the appropriateness of climbing, basic management instruction-including the use of fixed anchors as well as the many other elements of the climbing system-and a directive for individual supervisors to work with the climbing community for on the ground implementation and additional guidance where needed. These tenets make up the core of a Climbing Management Plan, which the Forest Service has been advised on for nearly 20 years yet only implemented on two occasions (South Platte and Rumney Rocks) across the agency.

This is a great opportunity to get national guidance in place for rock climbing in non-Wilderness. I urge the Forest Service to work more closely with the climbing community, namely the Access Fund, to refine this language and make it clear, effective, and enforceable.