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Comments: The Draft U.S. Forest Service (USFS) Manual 2355 proposes a reinterpretation of long-standing USFS policy and practices regarding management of fixed climbing anchors in Wilderness (hereafter "the Proposal") that undermines the spirit and intentions of the Wilderness Act. The USFS must not enact the Draft Manual 2355, as it creates a problem where one does not exist, and where the status-quo management practices and policy are more efficient and effective for the USFS, climbers, and other Wilderness users and stakeholders, alike.

1. Under the Act, a defining characteristic of wilderness is an area that "has outstanding opportunities for solitude or a primitive and unconfined type of recreation." Many types of climbing that have been practiced in wilderness areas for decades represent archetypal modes of "primitive and unconfined" recreation, yet rely on fixed anchors that are all but invisible to other visitors. In short, such fixed anchors are not installations that are incompatible with the Wilderness Act; they facilitate its effective and intended implementation.

2. The Proposal would lead to the removal of - and perhaps worse - uncertainty in the existence of fixed anchors that climbers have long used, rely on, and count on being in place to safely ascend a climb, descend from a climb, and/or manage an emergency. This increases the risk inherent in Wilderness climbing in a way that is difficult to predict and manage (a skill practiced by Wilderness climbers). It would result in greater hazard, more accidents, and likely increased fatalities in the Wilderness areas managed by the USFS.

3. The Proposal imposes administrative requirements on the approval of anchors that the USFS does not, nor is likely to have, the administrative capacity to absorb. As such, a backlog of legitimate proposals and requests for fixed anchors that would have otherwise been authorized will have two consequences: (1) the lack of specific fixed anchors necessary for the safe practice of wilderness climbing will lead to the foreseeable negative outcomes cited above - more accidents, injuries, and deaths, and; (2) individuals who recognize the legitimate use of fixed anchors is being stymied by a lack of sufficient administrative capacity will place them anyway, resulting in more unapproved fixed anchors that the USFS will have to somehow deal with (or ignore).

4. The Proposal's emphasis of considering fixed anchors on a case-by-case basis is both unrealistic (per the USFS's capacity constraints noted above) and unnecessary, as types of fixed anchor use and their methods can often be more effectively and efficiently determined at the level of the route, location, and even park (or area).

5. The Proposal's restriction of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and works against the recreational management mandate and responsibility of the USFS. Non-Wilderness climbing management policy should maintain opportunities for new fixed anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

6. Current USFS guidance and interpretation of the Wilderness Act that the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management, as well as the prohibition of motorized equipment in wilderness, already effectively manages climbing practices that would be incompatible with the Act (e.g., the concentration of human climbing activity). This dramatic reinterpretation is thus unnecessary (and as mentioned above, actually undermines the intent and purposes of the Wilderness Act).

7. The Proposal undermines nearly 60 years of collaboration between the USFS and the climbing community to arrive at a fixed anchor management policy that best achieves the preferences and intents of climbers while still meeting the letter, intent, and purposes of the Wilderness Act.