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Comments: The Leavenworth Mountain Association is a non-profit stewardship and climbing advocacy organization based in Leavenworth, Washington. Our mission is to support Leavenworth's canyons and mountains through stewardship, education, and partnership. Over the last decade we have organized and hosted many stewardship events from trail building and maintenance to litter pickup. With the help of volunteers, we've removed thousands of pounds of trash from the local Icicle and Tumwater canyons over the last 10 years during our annual Icicle Cleanup event. In addition, we work directly with our local Wenatchee River Ranger District USFS office on education and outreach for visiting climbers and, critically, to help mitigate the impacts of the booming participation in outdoor recreation by paying for and managing temporary toilets during high-use climbing seasons (spring and fall) when USFS bathrooms are out of service. The vast majority of climbing in Central Washington is on federal Forest Service land. Day to day, we are "on-the-ground" and well versed on the impacts, and indeed changes, related to climbing as recreation on these federal lands.

We are submitting this comment in opposition to the proposed regulations detailed under FSM 2355 Climbing Opportunities #ORMS-3524.

Fixed anchors are essential components of a climber's safety systems. For more than 50 years the thoughtful and judicious placement of hand-drilled bolts has been allowed under Wilderness policy. Continuing this status quo is essential to allowing climbers to safely practice their recreation and does not meaningfully detract from the wilderness experience of other users who do not travel or recreate in the same terrain. Thousands of climbers travel to our area to climb in the Enchantments - part of the Alpine Lakes Wilderness. This area is home to dozens of historic and nationally-known wilderness rock climbs. Under this proposed policy change, the safety of climbers traveling to attempt these routes is put in jeopardy.

In the last couple of years we have seen an almost unmanageable increase in mountain search and rescue missions. Prohibiting the placement and use of fixed anchors such as bolts will certainly add to the mission burden and could cost lives due to climbers taking unnecessary risks. We must allow climbers the opportunity to explore wilderness terrain on public land, and allow them the low impact tools to do so safely - indeed, a well-paced, hand-drilled, bolt is lower impact to the terrain and less unsightly than a tangled web of nylon webbing littering a mountain ledge. It is unreasonable for the USFS to create new policy prohibiting fixed climbing anchors in Wilderness after decades of allowing their judicious use and without sound reason for their prohibition.

In addition to the safety concerns above, these proposed new regulations are entirely unmanageable and unenforceable for local USFS offices who are already severely understaffed and underfunded in general, and specifically for our area, for recreation management. We are not utterly opposed to all USFS recreation related policies. In fact, we - as a local non-profit that deals directly with stewardship of recreation on federal land - understand more than most that as outdoor recreation booms nationally, land managers must adapt to meet the rising needs. However, there is an effective way to meet these needs. Fully fund and staff local forest districts to execute basic stewardship responsibilities like operating and maintaining existing infrastructure and educating the public. Prioritize future-proofing popular wilderness trails against erosion and high use - like our very own Colchuck Lake trail - and the toilet and camping infrastructure already in place in these areas. Blanket prohibitions that contradict decades of previous policy do not meaningfully meet these growing needs. With all due respect to our local USFS office, we do not understand how this new policy is remotely manageable given the funding they have available. For several years our local Ranger District had a Climbing Ranger program. However, the program has had high employee turnover and has never been led by a permanent employee. Last year, the program lost funding and was abandoned. There are simply no Forest Service staff available in our area with the experience or expertise to create or enforce the proposed Climbing Management Plans. In this way, even the intent of these new regulations rings hollow.

Finally, climbing, and particularly climbing in America's Wilderness areas, has a rich history. It is a cultural legacy that is celebrated both domestically and internationally for its beauty and for the experience it offers those who practice it. The policy changes outlined in FSM 2355 Climbing Opportunities #ORMS-3524 are a direct threat to

this legacy and to the opportunities that climbing on public land offers to Americans. Permitting the responsible use of public lands to recreate - as the current climbing management policies do - fosters and environmental awareness that is a boon to those among us - like you and I - who care deeply about our public land and our wild places. The changes proposed here threaten that recreation directly, and unreasonably gate-keep public land recreation for future generations.

Chris Simrell,  
President - Leavenworth Mountain Association