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Organization:

Title:

Comments: I am writing to oppose the proposed policy changes. I am a climber, a route developer who has bolted anchors on non-federal public land, a wilderness advocate, and a former USFS Biological Science Technician who spent months working in NPS, NFS, NW, and BLM wilderness areas as part of a Biological Opinion Effectiveness Survey.

Climbing cannot be separated from fixed anchors. If climbing is to be accepted as a reasonable activity in wilderness, fixed anchors must be allowed. I support policy that regulates fixed anchors, such as how many can be placed, what type, where, for different purposes, different types of anchors, etc; however, the current proposal's language prohibits fixed anchors by default, while allowing for exceptions to be made. There are too many fixed anchors already in existence that need to be maintained and eventually replaced for a national prohibition to be feasible, and this policy is set up to fail from inception. Given the language used, I can only assume the policy writers knew this policy was an effective ban on anchors knowing that the MRA process cannot be effectively used for hundreds of thousands of anchors. I suggest rewriting the policy to allow placement of fixed anchors (without powertools) by default, while providing management staff a pathway to regulate fixed anchors (including prohibition when warranted).

I also suggest that NFS Climbing Rangers be involved in any changes to existing fixed anchor policy. If a forest district does not have climbing ranger staff, either hire a ranger or bring a ranger in from a nearby district. Non-climbers cannot understand the complexities of fixed anchors to effectively manage them.

Further, I want to bring attention to the language involving replacement of existing anchors and placement of emergency anchors. The proposal as written allows for each, however it also creates an avenue for the NFS to punish climbers acting in good faith. Replacement of fixed anchors, using like-kind equipment, should not require an MRA process unless the staff have already reviewed the anchor and written policy around it (such as maintain as X equipment, maintain as retreat anchor, supplement with X equipment, or remove anchor). Again, all anchors should be allowed by default while giving NFS staff a way to regulate (including prohibition where warranted).

I also suggest that in areas where there are professional climbing guides who make money on wilderness lands, that they be explicitly excluded from installation or removal of fixed anchors to discourage a conflict of interest, though I would suggest that they be allowed to maintain fixed anchors.

I also oppose the proposal language that restricts the new development of climbing resources outside of wilderness areas. Any areas or resources which the forest district deem inappropriate for climbing should be specified by the forest or district. No one wants new climbing routes over ecologically sensitive areas or historically sensitive areas, but it's much more reasonable for a forest or district to dictate what is off-limits to climbing rather than make a new decision each time someone wants to explore a new part of their public lands.

Again I wish to reiterate that, while I am opposed to the current policy, I (along with many other climbers) support the NFS in managing fixed anchors. In more simple terms, the current proposal makes fixed anchors "guilty until proven innocent" which is ethically wrong, goes against historical and legal precedent (such as anchors that predate the wilderness act), and unenforceable. I hope future proposals make fixed anchors "innocent until proven guilty" that provide NFS staff simple and effective ways to manage fixed anchors where conflicts exist (including prohibition where necessary), but these conflicts must be well articulated, documented, and resulting management decisions should directly address the conflict, be proportional to the conflict, and be systemic (i.e. district/forest wide) where possible.

Thank you for your time. - Alec