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Comments: Dear United States Forest Service,

I am a university student and climber from South Carolina. I climb in North and South Carolina which are states notorious for their "Leave-No-Trace" practices in using fixed anchors in their climbing areas. I am writing to express my opinion that the placement and replacement of fixed anchors and equipment should not be solely limited to established climbing opportunities or to opportunities that have been evaluated for impacts.

Forest Service Manual, Section 2355.31, Article 3, states: "Restrict the placement and replacement of fixed anchors and fixed equipment to established climbing opportunities and to approved new climbing opportunities that have been evaluated for natural and cultural resource impacts." This proposed language in my opinion is completely unenforceable and cripples the spirit of adventure in climbing.

The nature of climbing is that "established" climbing opportunities are widespread and unknown. Climbers have a role as explorers who cross tracts of public land looking for rock to climb. Oftentimes, climbers do not promote knowledge of their first ascents (first person to climb/establish a climb). The language used in this proposal then is not effective because areas deemed to be unestablished might have been historically climbed and established. This language would take away climbing opportunities that climbers might have a legal right to use under the proposed language.

Another concern of mine is that the Forest Service Manual, Section 2355.31, Article 3, treats climbing areas with a "guilty until proven innocent" mentality.

The language of Section 2355.31, Article 3 implies that all expansion of climbing into unexplored climbing areas would adversely impact wilderness character. Section 2355.03, Article 4, states, "Climbing or climbing-related activity in wilderness must be restricted or prohibited when its occurrence, continuation or expansion would adversely impact wilderness character". By restricting the expansion of climbing in Section 2355.31, the United States Forest Service then implies that expansion of climbing detracts from wilderness character.

The idea that all climbing expansion would detract from wilderness character is unproven and inaccurate, however. Bolting and fixed anchor implementation can be extremely nonintrusive. Bolts can be painted to be the same color as the rock, rendering them invisible to the public while still being usable for the climbing community. Is something that is near invisible from the ground a detractor from wilderness character? In my opinion, it does not detract from wilderness character.

I believe that the wording of the aforementioned sections and articles can be extremely damaging to the spirit and development of climbing in the United States. I hope that my concerns will be heard.

With hope,

Jacob H. of South Carolina