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Comments: I am a long-time outdoor enthusiast, climber, promoter of conservation, and am white carded with the USFS. I recreate, work, and volunteer in our national forests and wild spaces. My local national forests are sacred places to me, and I treasure the time I spend in them. I find spiritual peace and fulfillment in these wild spaces, and responsible use of these public lands is often in my mind. Having read through the proposed language of section 2355, I have reason to both support and critique it. I might initially frame my thoughts by explaining another perspective or context of how climbing fits into a wilderness area.

To create a trail through a wilderness area is an attempt to provide safe passage for those who chose to enjoy the bounty of our wild spaces. That trail is not natural to the area, yet is allowable for access for our citizens. These trails change the landscape and represent one form of man's effect on the land. One of the primary purposes of the Wilderness act is to preserve the natural state of these regions while still providing "outstanding opportunities for solitude or a primitive and unconfined type of recreation." When considering the climbing done on forest service land and in wilderness environments, perhaps it can best be viewed as another type of trail, but set in perpendicular axis to those already found acceptable by most users of these wilderness areas. These vertical trails provide unparalleled opportunities for citizens and lovers of nature to explore an aspect of wilderness that is in many regards much more wild than other areas in which recreation is usually pursued. It would seem then, that restrictions to the appropriate use of this vertical terrain would be antithetical to the purpose of the Wilderness Act. Much in the same way a trail might be maintained and updated to prevent erosion and to keep conditions appropriately safe for its users, climbing routes containing fixed hardware also are a way to maintain our vertical paths in the wildest of our spaces. This perspective should in no way be interpreted as an excuse to allow for unrestricted new bolting of rock faces, which I believe the majority of the climbing community would also frown upon. In the same way that it would be anathema to intentionally widen a footpath to accommodate passage for a recreational vehicle, unnecessary placement of fixed gear on the rock would be a blight on these sacred and beloved spaces. However, we cannot ignore the fact that in some instances, those who enjoy the established trails into the vertical wild or who are exploring new spaces on these rock faces depend from time to time on an appropriate safety factor to allow access to their own "opportunities of solitude." Wherever possible removeable protection should be the standard, but sometimes placement of a fixed anchor is necessary to preserve safe access.

I support the proposed language in section 2355 that climbing is determined acceptable use of wilderness land. I also support the proposed language that allows for keeping of the currently placed anchors. I recognize the nod that was given in proposed section 2355 that climbing routes represent "unconfined recreation." Indeed, to allow inadequate upkeep or placement of climbing bolts would restrict the principle of unconfined recreation. I support that the proposed section 2355 appears to have its motivations in an appropriate use sphere. However, I do have some concerns about the given language of the section.

I have some objections to the intent of classifying fixed hardware as "installations" as defined in section 4(c) of the Wilderness Act. As noted above, these "installations" are analogous to any man-made improvements for the safety or ease of access of a wilderness foot trail, which I would suspect are not currently considered "installations" as described in section 4(c).

I also have some concerns that each of these climbing "installations" will now be subject to a Minimum Requirements Analysis. In instances where such hardware may need replacement or updating, a mandatory analysis may present a significant safety risk and delay to users of these wild spaces if such analysis is not a priority at a higher administrative level. This also opens up the possibility that a Forest Supervisor who may not have a personal understanding or background in appropriate maintenance or development of a climbing area will

allow these areas to dwindle unnecessarily, thereby compromising the safety and access to these spaces. These climbing areas may also be subject to effective closure based solely on the opinions of an individual Forest Supervisor, as opposed to the law enacted to protect these areas.

There may be concern about individuals who run contrary to the ethical standard of climbing development. I am certain that there are instances in which a member of the climbing community has made a decision which might generally be seen as contrary to the wilderness ethic, but this is just as true of every other community of outdoor users. In these instances for any type recreationalist, the correct approach might be education, correction, and discipline as needed. I can only hope that these limited instances do not unjustly serve as an impetus to restrict access for the group as a whole.

It would be a mischaracterization to determine that those who pursue climbing in wild spaces are there to pursue just the physical activity of the sport. Over my decades of climbing, I can say that the members of the climbing community who enjoy climbing on wild land go just as much, if not more so, for the wild nature, separation from the constant pressures of modern life, and to enjoy the natural beauty of the land from a physical perch that provides unequalled perspectives. And that speaks exactly to what the spirit of the Wilderness Act was created to sustain in perpetuity. For these climbers, access to wilderness environments is a hallowed panacea. It would be a shame to deprive these individuals who seek the same sense of solitude as every other kind of outdoor recreationalist who visits the wild. The presence of tactfully and appropriately placed fixed protection seems a small price for such priceless benefits. Maintenance of hardware already placed is an extension of this same idea. For those of us who develop and maintain climbing routes, we usually view our work as a responsibility based heavily in climbing ethics, with land preservation in mind. Would it be considered contrary to the aims of the Wilderness Act to repair a section of trail that if left to its own devices would create a significant hazard to its users? We the people already support the concept of safe access in these areas, and the maintenance of fixed protection is in no way different.

There are provisions within the Wilderness Act that allow for the grazing of livestock, placement of power lines, public works, etc, specifically when those uses "would better serve the interests of the United States people." This would indicate that in some instances it is felt appropriate to allow for permanent changes to the environment in the benefit of the people. While grandfathered in, the allowance of livestock grazing seems to be more likely to leave more of a mark on the land than would the permittance of fixed climbing gear, especially when much of such gear is located in places not even visible to those not using those spaces. I have visited forest land where livestock roam, and it is much more a visible disturbance to nature than any climbing anchor. I would not feign to restrict the use of that land where it has already been grandfathered in, and it seems analogous to promote similar support for climbing gear used by private individuals where it has already been established in wilderness areas. Likewise, we would not restrict the upkeep of the cattle on these lands, nor should we restrict the upkeep of fixed climbing protection.

Let us keep these places wild. Let us keep them free to access. Let us be intentional about their use. However, let us also consider the negative effects of the potential restrictions and language in section 2355.