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Title: Executive Director Emeritus

Comments: Thank you for providing me with the opportunity to provide comments on the proposed USDA Forest Service proposed directive FSM 2355 Climbing Opportunities #ORMS-3524. I first learned to climb in 1972 while attending the Voyageur Outward Bound School. Then in 1974, at the National Outdoor Leadership School, I went on a five-week expedition in the Wind River Mountain range and earned a Mountain Guide Certificate.

My first encounter with a government entity regulating rock climbing was in 1982 when the Clifton Gorge Climbing area in John Bryant State Park was closed to climbing. I joined the Board of the Ohio Climbers Association and was elected to the position of President. A position I held for 10 years. During that period was when I first got involved in the Access Fund national climbing organization. I left the Ohio Climbers Association when I was recruited to become a Board member of the Red River Gorge Climbers' Coalition. Upon joining the RRGCC Board I was elected to the position of President. After serving in the President position for one year I was chosen to become the second Executive Director. I served as the RRGCC Executive Director for 10 years in a volunteer capacity. During this time I was involved with the Forest Service, Land Management Plan development plan process and the in the three year Limits of Acceptable Change process for Daniel Boone National Forest. I also spent three years renegotiating the RRGCC's Memorandum of Understanding with the Daniel Boone National Forest. I have spent literally thousands of hours of my life fighting to promote and secure climbing access. Thus it is very disheartening to see the Forest Service FSM 2355 proposal to impose severe nationwide restrictions on recreational climbing.

I have enjoyed climbing in the Red River Gorge for over 48 years. This includes having climbed in the Clifty Wilderness Area including the Eagle Point Buttress, Wall of Denial, and Funk Rock City. These climbing areas are remote and provide a feeling of solitude. There are fixed anchors at all three of the areas and their presence does not detract from the wilderness experience of these areas. The proposal to subject the use of fixed anchors in wilderness to a Minimum Requirements Analysis (MRA) is objectionable to me. After researching the Wilderness Act and legal writings interpreting said Act, the proposed use of an MRA appears to be inconsistent with the Act. All of the prohibitions listed in the Act address macro scale activities such as commercial activities, roads, structures, and motorized vehicles. It can also be construed that the word installations meant macro scale activities such as military installations or scientific research installations. Considering fixed anchors to be an installation is an overreaching interpretation by the federal government.

I am also extremely concerned about the potential impact of the proposed action to essentially prohibit fixed anchor placement and maintenance, threatening climber safety inside or outside of designated wilderness areas. In 2009 two Red River Gorge climbers perished after they clipped into a belay station consisting of two rusty bolts and a piece of worn tubular webbing which failed. Climbers must be allowed to maintain or replace existing anchor without restriction. Not allowing such will certainly result in climber injuries and deaths.