Data Submitted (UTC 11): 1/31/2024 2:40:24 AM First name: Alexander Last name: Willis Organization: Title: Comments: Dear USDA Forest Service,

I appreciate the opportunity to provide feedback on the proposed directive FSM 2355 Climbing Opportunities #ORMS-3524. As a dedicated rock climber who frequently enjoys public lands, I want to underscore the importance of allowing fixed gear in climbing without the restrictions in the proposed directive. Here are key reasons supporting this perspective, along with a suggestion for a comprehensive solution:

Safety Considerations:

Fixed gear, including anchors and bolts, is indispensable for ensuring climbers' safety. Emergency situations, such as injuries or unforeseen challenges, may require fixed gear (like bolts, pitons, and slings) for life-saving measures like emergency rappels. Often, these decisions must be made in the moment. The proposed directive will endanger climbers by making the installment of fixed anchors in these situations illegal. Permitting the use and installment of fixed gear without requiring prior approval is essential for maintaining a balance between legitimate and appropriate use of wilderness and safety protocols.

Community Involvement, Stewardship, and Legacy:

The climbing community is intrinsically connected to the appreciation and preservation of public lands. Allowing the installment of fixed gear without explicit prior approval encourages a sense of responsibility and stewardship among climbers, motivating them to actively participate in conserving and sustainably using these natural resources. Climbers often evolve into valuable advocates for environmental protection and land preservation. The new management guidance, which goes against many years of precedent, will prevent this participation. America also has a rich climbing legacy and is home to some of the world's greatest climbing achievements. This important history is threatened by the proposed directive. Climbing management policy needs to explicitly protect existing routes from removal without the need for new approval.

Environmental Footprint:

Climbers are typically dedicated to minimizing their environmental impact during climbing activities to preserve the experience of wilderness climbing. This often requires the use of fixed gear, as it enables climbers to adhere to established routes and structures. For example, rappelling from fixed gear instead of using social trails.

Practicality:

Prohibiting the creation of new routes exclusively to "existing climbing opportunities" on non-Wilderness lands is impractical and is likely to cause confusion among both land managers and climbers. The climbing management policy for non-Wilderness areas should allow for the establishment of new anchors unless and until comprehensive analyses conclusively demonstrate that restrictions are necessary to safeguard cultural and natural resources.

Streamlined Documentation Solution:

To address safety, community involvement, and environmental footprint concerns associated with prohibiting fixed anchors, I propose a streamlined approach to the proposed directive. The directive should only require that new fixed anchors be documented, eliminating the need for prior approval. This approach not only simplifies the process but also encourages climbers to actively contribute to the preservation of public lands.

This streamlined documentation solution will resolve safety concerns and facilitate community involvement by

allowing climbers to participate in a transparent and straightforward process. Additionally, it contributes to minimizing the environmental impact of climbing and preserving America's rich climbing history by documenting the development of climbing routes.

In summary, endorsing fixed gear in climbing on public lands with streamlined documentation is a holistic solution that ensures safety, encourages community involvement, minimizes environmental impact, and contributes to documenting the nation's climbing heritage.

Best regards,