Data Submitted (UTC 11): 1/31/2024 3:59:25 AM

First name: Mark Last name: Verosky Organization:

Title:

Comments: I am writing to express my deep concerns regarding the recently proposed draft climbing management guidance for public comment. As an avid climber who frequents USFS land, climbing has become an integral part of my family's recreational activities. I am troubled by the potential impact this draft plan may have on the climbing community and the longstanding traditions associated with climbing in wilderness areas.

Specifically, the proposed interpretation of climbing hardware, such as bolts, as prohibited installations raises significant apprehensions. This could render the replacement of existing bolts illegal, burdening climbers with excessive paperwork and, more importantly, introducing safety concerns. Fixed anchors play a crucial role in climbers' safety systems, and designating them as prohibited "installations" contradicts the principles established by the Wilderness Act.

Moreover, I am deeply concerned that the proposed policy could undermine America's rich climbing legacy, potentially erasing some of the world's greatest climbing achievements. Climbing management policies should be crafted to protect existing routes from removal and honor the contributions of the climbing community to our nation's outdoor heritage.

In addition to these concerns, I would like to highlight that restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Over the past half-century, existing climbing policies have allowed for the judicious use of fixed anchors, striking a balance between preserving wilderness character and accommodating primitive and unconfined wilderness climbing. It is unreasonable to introduce new policies that outright prohibit these essential safety elements when federal agencies have historically managed and authorized their use.

Beyond safety concerns, prohibiting fixed anchors presents obstacles to regular maintenance undertaken by the climbing community. Critical safety decisions often require swift action, and any authorization process should not impede these crucial moments. The proposed policy risks hindering safe anchor replacement and jeopardizing climbing routes' integrity.

The prohibition of fixed anchors also obstructs the appropriate exploration of wilderness areas. Climbers should be allowed to navigate complex vertical terrain with the flexibility needed for in-the-moment decisions. Land managers must recognize the importance of permitting climbers to explore wilderness areas while maintaining a delicate balance that upholds safety and preserves the essence of climbing.

In conclusion, I urge you to reconsider the proposed draft climbing management guidance, taking into account the concerns raised by the climbing community. Preserving the safety, traditions, and legacy of climbing on USFS land should be a collaborative effort between land managers and climbers.

Thank you for your attention to this matter.