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Comments: As a hiker, backpacker, and climber, I deeply value spending time in the unspoiled nature of wilderness areas. I appreciate that this regulation by USFS is intended to preserve that unspoiled character in wilderness areas and I do not have strong objections to the spirit of the regulation.

I appreciate that regulation affirms, in policy points 1 that "Climbing is an appropriate use of NFS lands when conducted in accordance with applicable law and Forest Service directives and consistent with the applicable land management plan and climbing management plan," and in policy point 6b that "the placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act, but the establishment of bolt-intensive climbing opportunities may be incompatible with the preservation of wilderness character."

As a climber, this clearly-articulated approach from policy points 1 and 6b generally seems reasonable to me. However, when I continued to read the contents of the proposed climbing directives, I became concerned that it would not lead to the reasonable intended outcome of policy points 1 and 6b. Rather, it creates incentives that would effectively erase climbing in most wilderness areas.

My main concern is that an MRA is required for any fixed anchor installation, even "the occasional placement of a fixed anchor for belay, rappel, or protection purposes" which, as policy point 6b wisely states, do "not necessarily...violate the Wilderness Act." These occasional fixed anchors are necessary even when climbing with the removable equipment referenced in policy point 6a because fixed anchors must be left behind to descend any climb where you cannot simply walk down from the top. Many land managers, facing time and financial constraints, will likely see the MRAs as burdensome. Because of these constraints, land managers may feel the easiest course of action would be to avoid the MRA upfront by simply arguing that climbing does not "fulfill park and wilderness recreational purposes" or "further wilderness values" in Step 1. The way the proposed climbing directives are currently written, the fast and cheap option for land managers is always to limit climbing. That is a dangerous incentive that will have lasting repercussions, limiting wilderness climbing beyond the spirit of policy points 1 and 6b.

Instead, I would recommend a subtle change to align the paperwork incentives more closely with the spirit of policy points 1 and 6b. Instead of saying that all fixed anchors are essentially not allowed until an MRA is approved, the proposed climbing directives could establish a status quo in the spirit of policy points 1 and 6b, and require an MRA in any area to adopt a more expansive or more restrictive approach based upon the goals of land managers in their specific area. For example, instead of the current language, the proposed climbing directives could state that an MRA is not required to place occasional fixed anchors for belay or rappel, or for protection purposes in places where removable protection cannot be placed, so long as the fixed anchors are not visible from any road or established trail at the time of placement. This simply shifts the status quo to align with policy points 1 and 6b. To take a more restrictive approach (fewer fixed anchors), parks and individuals could request it via a process similar to an MRA. To take a less restrictive approach (more fixed anchors), parks and individuals can do it via the same MRA process detailed in this proposed climbing directives .

This would ensure that the incentives facing land managers are aligned with the spirit of these proposed climbing directives and policy points 1 and 6b, ensuring that climbing--and the unique exploration of wilderness it enables--is not restricted unnecessarily just because it is the quick and easy way to comply with regulation.

I have a few additional concerns and comments:

- The rule stating that "on routes that have not yet been evaluated, climbers may make emergency replacements

of pre-existing fixed anchors if necessary to exit the climb in the safest and most expeditious manner possible" is not practical, is dangerous, and will likely lead to fatalities. There simply are too many existing routes to evaluate them all in a timely manner, leaving old and questionable gear on routes for years or even decades. Additionally, in some parks, park rangers may not have the skills and expertise to climb the routes and evaluate the fixed anchors. This is truly an accident waiting to happen and it affects not just the climbers who choose to climb a route, but also for any climbing rangers, first responders, and search and rescue teams that may need to use fixed anchors for rescue work. Another subtle change that would make a significant difference is to allow the climbing community to continue to maintain existing routes (by replacing suspicious fixed anchors, but not adding additional fixed anchors) until they have been evaluated. This would be a simple way to improve safety and give land managers more time for the laborious work of evaluating every single climbing route.

- I'm concerned that, in practice, an MRA led by someone unfamiliar with climbing will find it easier to ban all fixed anchors than understand the nuance and that there's a big difference between having a few bolts for safe descents from an alpine peak--where no one other than climbers will ever see them--and having a wall covered in bolted sport climbs in a wilderness area.

- While I think that the spirit of policy points 1 and 6b are reasonable for wilderness areas, I do not think they are the right approach for all USFS lands. The climbing directives state that ranger districts can use this approach in non-wilderness areas could lead to overly-restrictive policies in areas far from the wilderness lands this policy was meant to address.

- One part of the NPS draft regulation that is not included in the USFS version is the list of actions and measures under the liabilities section make a lot of sense, especially the bullets regarding (1) creating a climber reporting system for potentially problematic fixed anchors, (2) working with climbing groups or individual climbers to replace or remove fixed anchors, and (3) use climbing groups or individual climbers through the Volunteer in Parks Program to help monitor and manage fixed anchors.

- On a closing note, I'm not so concerned about major climbing destinations with a robust climbing community and land managers that are intimately familiar with climbing. I'm more concerned about less-popular wilderness areas, where limited (and discreet) fixed anchors that allow for safe descents from peaks of true wilderness character.