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Title:

Comments:

I do not approve of the proposed Climbing Opportunities directive.

As part of consideration of my comments please understand that rock climbing is a well developed sport and lifestyle. It is abundant in the western USA where public land is plentiful. It is a growing sport thanks to its inclusion in the Olympics, growth of climbing gyms nationwide, and media attention on the sport. It is historically and presently a dominant outdoor activity and its participants are lovers of the natural world.

All of my concerns relate to the directive's treatment of fixed climbing hardware (anchors) as "installations". I believe this designation will have several adverse effects and as such the language in the directive is unacceptable. It is my belief that such a simple designation will harm relations between the Forest Service and a large interest group, and inappropriately target that same group for dubious reasons.

1. The directive's choice to treat climbing anchoring equipment as "installations" will mean climbing routes in wilderness (a majority, numbered in thousands) will need to be reviewed for anchor retention or removal. This process will be beyond the capacity of most USFS districts, which are already short on human resources. Several will not have adequate in-house knowledge on climbing to make educated decision, less a legally safe one. Most likely many districts will choose a lump decision that applies to all routes, past and present, and won't do a piecemeal analysis. For legal reasons this likely will be simplest to handle by denying all anchors, everywhere. Routes will be returned to a primitive state and no new routes will be allowed with any anchors. This would in effect remove thousands of routes from general availability and NOT result in a fair and equitable management plan.

2. Part of the concept behind the Wilderness Act is providing access for people to connect with nature and thereby maintaining a base of people who instill the value to be stewards of wildness. This can't happen without providing access for various user groups. Climbers are just one. Removing routes would damage that relationship - effectively creating a disinterested group that cares less about preserving wilderness.

3. The removal of anchors will make routes considerably more dangerous by removing the adequate "protection" afforded by bolts and other fixed gear. More injuries may happen on such routes, and without rappel anchors or other hardware for lowering, rescues will become a bigger risk to injured parties as well as the rescuing party. This will inadvertently put even more pressure on local and federal resources.

4. There are now over 100 years of rock climbing history in the USA, and for as long as wildernesses have been designated. Many wildernesses were established around pre-existing routes with established hardware. A large contingent of users have been active in wildernesses for the duration. By forcing the changes proposed in the directive there is a "tough pill to swallow". It appears as a retroactive, retaliatory effort. As a climber myself it is difficult to review this proposal and not wonder why we've had to wait 60 years for this to be added, after such a substantial rock climbing culture has been allowed to form around wilderness the way the original Act was written.