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Comments: Thank you for considering my comments. I am pleased that this policy states that "climbing is an appropriate use of NFS lands"

With regards to non-Wilderness climbing resources, Restricting new climbing route establishment to "existing climbing opportunities" will be impractical for land managers to enforce and will create confusion and unnecessary conflict between land managers and climbers who have effectively worked together for decades.

Land managers should restrict climbing when necessary to protect cultural and natural resources but Non-Wilderness climbing management policy should -as clearly stated policy- INCLUDE opportunities for NEW, fixed, climbing anchors. For example, for years climbers have understood and obeyed closures for raptor nesting. These types of closures seem to work and are educational where broad restrictions on anchor placement would do little to educate climbers and empower climbers to engage their peers to protect resources.

With regard to Wilderness climbing:

All climbing- requires some -minimum- use of fixed anchors. Wilderness climbing is not different than non-wilderness climbing in this regard. Climbers, who understood this concept, were among those that advocated for and helped to establish the Wilderness Act.

Well placed, camouflaged, fixed anchors are the best solution for minimum impact in Wilderness. Bolts are very often the best in appearance, most long lasting, and least destructive option for this necessary part of Wilderness travel. Slings kill trees, webbing and cord anchors are often colorful and negatively impact the visual experience of Wilderness travelers. Land managers responsible for Wilderness should be encouraging the use of fixed anchors in place of these other (poor) solutions.

Climbers themselves are the best people to make decisions about fixed anchor placement. Vertical travel requires the ability to make good decisions about where and when to place anchors. Requiring the same "minimum requirement analysis" (MRA) process, that "installations" like signs and bridges undergo, for the placement of fixed anchors for climbing is impractical. While the language of the proposed policy change does not explicitly ban fixed anchors, the use of the MRA process will create a defacto ban and put climbers doing what climbers need to do to be safe in the backcountry in violation of policy.

What has changed? Are Fixed Installations of climbing anchors really even the problem that land managers are trying to solve for? I fully support land managers regulating fixed anchors in Wilderness and it is clearly part of their mandate under the Wilderness Act. I thinking that they have generally done a good job with this part of their responsibility over my 35 year experience climbing and visiting Wilderness. I wonder if the issue today is not about fixed anchors at all but instead should really be a focus on the crowds of people that well-protected climbing routes sometimes attract causing other resource damage and impairment to a Wilderness experience. Surely there is a way to regulate visiting humans in vertical Wilderness without resorting to miring the use of fixed anchors in an elaborate MRA process. Climbers and land managers for decades have worked together amicably; now does not seem like a time to change this relationship.

I also have concern of unintended consequences-

- that my safety will be at risk because I will rely of poor bolts and bolted anchors instead of replacing them as I encounter them.

--- that certain, especially under resourced, land managers will use the regulating of fixed anchors as a means to restrict climbing unless and until they can get the finances they need to correctly manage all resources under their responsibility.

-that climbers and climbing access organizations- who often are supporters of new designated Wilderness- will stop supporting Wilderness as a way of preserving climbing resources. Wilderness needs all the supporters it can get and climbers are some of the original supporters of Wilderness and currently a reliable user group of advocates for establishment of new Wilderness and protection of existing Wilderness.

Thank you.