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Comments: I am commenting as a lifelong hiker and wilderness-lover and a relatively new rock climber. I care deeply about the preservation of our wilderness areas, and I am open to reasonable oversight and restrictions on climbing activities when they are necessary to protect these areas from unacceptable impacts. However, I am concerned that several elements within the proposed FSM 2355 Climbing Directive would restrict climbing opportunities both within and outside of wilderness areas far more than is necessary to achieve the desired outcome of protecting their wilderness character. Rather than commenting on each of these, I will attempt to highlight the more general issues with the plan and suggest a more viable alternative.

The proposed directive would prohibit all fixed anchor placement pending case-specific approval and review "as resources allow." Troublingly, no timeline is provided for this review process, and no assurance is provided that the reviews will even be completed. In contrast to the directive's stated objective to "provide climbing opportunities that serve visitor needs," I fear this would represent a de facto climbing ban in districts with insufficient resources to conduct the review in a timely manner. The requirement that fixed anchor approval be completed on a case-specific basis both inside and outside the Wilderness would use a disproportionately large amount of the agency's resources to control a disproportionately small impact on the managed land. I suggest that wherever possible, fixed anchor authorization should occur programmatically. Climbing Management Plans should identify broadly acceptable anchoring practices that minimize impact, and reserve more costly case-specific reviews to any climbs requiring anchors that are not consistent with the agency guidelines. This would represent a more efficient use of agency resources and a more balanced approach to managing climbing. Anchors with minimal long-term impact (for example, slings left around boulders to facilitate descent) should not require case-specific prior approval.

One other problem is the prohibition of fixed anchor replacement until reviews are completed. This will endanger lives. The replacement of existing anchors does not increase their impact, and should under no circumstances be restricted while reviews are under way. Thank you for providing the opportunity to comment and for protecting our country's public lands.