

Data Submitted (UTC 11): 12/21/2023 9:35:36 PM

First name: Mike

Last name: Reardon

Organization: Carolina Climbers Coalition

Title: Executive Director

Comments: Greetings, I am writing from the Carolina Climbers Coalition, a 501c3 nonprofit organization serving climbing areas in the Carolinas and beyond. We have a long standing tradition of stewarding climbing areas in our region, including areas like Linville Gorge Wilderness. We also work with Pisgah and Nantahala National Forests with on the ground stewardship needs surrounding climbing areas in our region, and with climbing management such as the 2023 Pisgah Nantahala Forest Management Plan.

We have reviewed the fixed anchor draft guidance and find several areas problematic. Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act.

Classifying fixed anchors as installations that require a Minimum Requirements Analysis (MRA) would essentially place a ban on fixed anchors, jeopardizing safety and jeopardizing climber's ability to experience the unconfined Wilderness climbing experience. Existing climbing policies in Wilderness have allowed judicious use of fixed anchors for more than a half century. For climbers and land managers, the existing fixed anchor policy is simple, protects Wilderness character, and provides for primitive and unconfined Wilderness climbing. It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions.

Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Throughout Wilderness areas in the Carolinas, for example, fixed anchors are placed in very minimal situations where natural protection is not available, and a fixed anchor would save the leader's life or severe injury in event of a fall. This language undermines a climber's ability to protect themselves. This new policy, if enacted, will essentially eliminate ground up adventure climbing; which is the core of our climbing tradition and directly rooted from the core values of Wilderness character.

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.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. The National Park Service and National Forest already have the tools in place to disallow climbing in site specific areas where natural heritage or cultural sites are affected. The Military Wall in the Red River Gorge, KY is a great example of this. Archeology sites are closed to climbing, while nearby routes are open to climbing because they would not impact these sites. If there is a specific area on NPS Wilderness lands where fixed anchors are arbitrary or causing damage to heritage sites; please review that particular area. It is inappropriate to instill a nation wide blanket prohibition on a critical tool in climbing, fixed anchors, when the vast majority of them are in appropriate locations that maintain wilderness character and provide for unconfined recreation to untrammelled places.

The climbing community is growing, and in each region there are dedicated groups of stewards and climbing organizations willing to help your local rangers and land managers with climbing management. This new classification of fixed anchors undercuts our ability and their ability to help manage climbing areas. This new classification of fixed anchors as installations and the MRA process will create an unnecessary mountain of work for your local rangers who are already overburdened with more pressing and less nuanced forms of land management. Please do not classify fixed anchors as installations in Wilderness. Please do not place this unnecessary burden on your visitors, US citizens, or your staff.