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Comments: I have been climbing in Wilderness areas for 2 decades, protected more Wilderness areas than the drafters of these policies, and I am disheartened by the draft policies submitted for comment. In 2008, I transferred 680 acres at Forterra to the USFS to be part of the Wild Sky Wilderness. In 2018, I provided grants and loans from Access Fund to the Wilderness Land Trust to secure 1,250 acres for the USFS in the Castle Crag Wilderness. Climbers were key drivers of the Wilderness Act and some of the greatest supporters of Wilderness Areas and bills designating hundreds of thousands of acres of more Wilderness since 1964. I worked at Forterra 2005-2008 and 2021-2023, Access Fund 2009-2020, and now work for the Tulalip Tribes conserving land for Treaty Rights and habitat. I know more than most what it means to truly conserve our natural lands in this country. And, I also know that climbing and climbers have an impact, like other recreational users, on the environment. I am at heart an alpine and traditional climber and I am opposed to multiple bolted climbs in Wilderness Areas because they cannot be reasonably maintained by a hand drill and can interfere with Wilderness Characteristics.

In 2013, North Cascades National Park banned fixed anchors after rangers chopped a set of rappel anchors of Forbidden Peak, which contributed to the death of a climber in a rappel accident. Leaving them in and allowing fixed anchors could have removed hundreds of pounds of webbing and tat and prevented this unnecessary death. When we met with North Cascades National Park Superintendent Karen Goodrich alongside the Wilderness Society and Washington Wild in 2014, she refused to listen to our broad coalition and instead had the audacity to say "the buck stops with me." This attitude by certain NPS and USFS staff that fixed anchors need their permission when they existed in Wilderness Areas long before 1964 is dangerous.

Even if a USFS Supervisor or NPS Superintendent and their staff are supportive of a minimum-requirements-analysis to allow the use, replacement, and installation of fixed anchors, what about the next set of staff and leadership? This is not the time to set a draconian restriction and is dangerous and unsightly for the current Biden Administration at this critical juncture of re-election. We all know that federal agencies do not have the staff nor the funding to waste their time with policies they cannot reasonably enforce. Its unfortunate that the USFS did not have the leadership to set reasonable restrictions in 1999. Instead, the USFS ignored this issue for another 24 years.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing 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. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

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.