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Comments: As an advocate for climbers and the preservation of America's climbing legacy, I would like to provide feedback on the recently released draft policies regarding fixed anchors in Wilderness areas. While I understand the need to balance conservation and access, I believe that the proposed prohibition on fixed anchors is not the most effective approach. Instead, I suggest considering improvements to the guidance that would address safety concerns, protect existing routes, and allow for the sustainable exploration of Wilderness areas.

1. The Wilderness Act and Fixed Anchors

Fixed anchors, such as bolts, pitons, and slings, are an essential part of climbers' safety systems and have been used responsibly for over half a century. It is important to recognize that these anchors are not prohibited "installations" under the Wilderness Act. Therefore, rather than outright prohibiting fixed anchors, it would be more appropriate to follow existing climbing policies that allow for their judicious use.

2. Decades of Managed and Authorized Use

Federal agencies have allowed, managed, and authorized fixed anchors for decades. It is unreasonable to create new guidance policies that prohibit Wilderness climbing anchors across the country without considering the long-standing practices and experiences of the climbing community. Instead, the focus should be on refining and improving existing management practices to ensure the preservation of Wilderness character while providing for primitive and unconfined Wilderness climbing.

3. Safety and Maintenance Considerations

Prohibiting fixed anchors would create safety issues by hindering the regular maintenance of these anchors, which is a responsibility undertaken by the climbing community. Critical safety decisions often need to be made in the moment, and any authorization process should not impede those decisions. It is crucial to manage fixed anchor maintenance in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

4. Encouraging Exploration and Protecting Routes

Prohibiting fixed anchors would obstruct appropriate exploration of Wilderness areas. Land managers should allow climbers to explore Wilderness in a way that permits in-the-moment decisions necessary when navigating complex vertical terrain. By doing so, climbers can continue to contribute to the rich climbing legacy of America while ensuring the protection of existing routes from removal.

5. New Routes and Non-Wilderness Lands:

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. It is vital to consider the ongoing evaluation of climbing areas and adjust management policies accordingly, allowing for the sustainable growth and development of climbing resources.

In conclusion, I urge the USFS to reconsider the proposed prohibition on fixed anchors in Wilderness areas. Instead, I recommend focusing on improving the guidance to address safety concerns, protect existing routes, and allow for the sustainable exploration of Wilderness climbing. By working collaboratively with the climbing community and considering their expertise, we can find a balanced approach that preserves the unique character of Wilderness areas while ensuring safe and responsible climbing access.

Thank you for considering these suggestions.

Sincerely,
Victor Yee