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Comments: 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. Removal of existing fixed anchors will jeopardize the safety of users of Wilderness areas.

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. This policy is an unnecessary reversal of long-standing precedent.

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, does not risk the removal of climbing routes, and does not penalize or jeopardize climbers that are making in-the-moment lifesaving decisions. As a federal civil servant, I am well aware of the bureaucratic nightmare that would ensue from the implementation of a "Minimum Requirements Analysis", requiring months, if not years, to resolve. This is a prohibitive, unsafe and unnecessary process.

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. This is necessary not only to protect our wilderness areas but also the safety of users of these areas.

The United States has a long, iconic history on the world stage associated with climbing. 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.

I urge the NPS/USFS to not make any changes to existing policy. There is bipartisan support in Congress for the Protecting America's Rock Climbing Act and America's Outdoor Recreation Act. If this legislation passes, it would direct the NPS, Bureau of Land Management and USFS to write new national management guidance that protects safe, sustainable access to Wilderness climbing.