

Data Submitted (UTC 11): 1/9/2024 10:08:59 PM

First name: Stan

Last name: Mish

Organization:

Title:

Comments: Please work with the climbing community in making reasonable upgrades to our existing public lands and wilderness area climbing management practices and avoid any explicit ban or permitting requirement for fixed climbing anchors.

There is bipartisan legislation moving through congress in the form of the Protecting America's Rock Climbing Act and America's Outdoor Recreation Act. Both moved through their respective committees with unanimous support in 2023. They direct NPS, Bureau of Land Management, and USFS to write new national climbing management guidance that protect safe, sustainable access to wilderness climbing. Please work with climbers and climbing organizations to help make your proposed policies compatible with your past practices and this upcoming legislation.

Fixed anchors are a crucial component of a climbers' safety system and are not "prohibited installations" under the Wilderness Act. Existing climbing policies have allowed well-judged use of fixed anchors for more than a half century.

Prohibiting fixed anchors will have little effect on the sustainable use of public lands. Climbing activities and associated fixtures represent one of the smallest impacts when compared to other human activities. Grazing, mining, roads, waterlines, trails, fences, dams, bridges, begin a long list of installations with impact many orders of magnitude above what climbers impose on the rock. Even when looking at climbing in isolation, the largest impacts by climbers include driving, hiking and camping. Public lands managers have bigger fish to fry than spending valuable resources regulating climbing.

Prohibiting fixed anchors will create safety issues by imposing 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 authorization processes should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes anchor replacement and does not risk the erasure of climbing routes. Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands will create confusion amongst land managers and climbers and is practically unenforceable.

Prohibiting fixed anchors obstructs appropriate exploration of public lands. Land managers need to allow climbers to explore public lands 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 as well as providing guidance for their maintenance.