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Comments: To Whom It May Concern,

I'm writing in opposition to several aspects of the National Park Service draft guidance for managing wilderness climbing, as well as to propose several potential alternatives and improvements to the guidance. On a personal note, I'm 40 years old and have been a rock climber for nearly 20 of those years. During that time, I've climbed in multiple National Parks, National Forests, Public Lands, National Monuments, and State Parks. It is noteworthy that I call myself a "rock climber" and not simply a participant in the sport of climbing. I intentionally make that distinction to emphasize the importance rock climbing has in my life, and to indicate that it is more than a sport for me and for many of its participants, it is a lifestyle and an identity. Rock climbing keeps me healthy, both physically and mentally. It allows me to enter into the wilderness, seeking refuge from the "noise" of our daily lives, and enjoy what many of you have worked tirelessly in order to preserve and restore. I consider an effective policy governing rock climbing to be one that considers the needs of land managers and agencies, while accounting for the safety and continued access of the climbing community.

Rock climbing is a burgeoning sport, having now been featured in the Tokyo Olympic games and to be featured in the upcoming Paris Olympic Games in 2024. A steady increase in indoor rock climbing gyms, exposing more and more individuals to the tremendous adventure and athleticism that the sport provides, has contributed to this overall growth. As the sport continues to grow, greater numbers of individuals will eventually make the transition from indoor climbing to outdoor climbing. As a result, land managers clearly need to evolve their policies to preserve our resources while maintaining safe and reasonable access for all. Unfortunately, the current draft guidance does not adequately ensure this and fails to account for the practical needs of the rock climbing community. Specifically, the following points should be considered in the comment incorporation:

*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.

Thank you for your time and consideration,

Alan Triman