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Comments: Historically, climbing has been a valuable recreational activity that is compatible with responsible use or natural resources. Climbing in National Parks and National Forests predates the Wilderness Act. Over the decades climbing has evolved and the popularity of climbing has grown. All of these points are objective facts - not opinion.

Fixed anchors are an essential for climbing. Fixed anchors are not prohibited "installations" under the Wilderness Act. In fact, as climbing and fixed anchors in National Parks and National Forests predate the Wilderness Act, it is clear that the Wilderness Act was written with this understanding.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country under the guise of calling such an "installation" under the Wilderness Act. Beyond the lack of basis for prohibiting Wilderness climbing anchors, the logical basis for the position is lacking, at best. Wilderness climbing and the requisite anchors have been allowed, managed, and authorized for decades.

Restricting or 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 process that could impede those decisions will either destroy climbing as a responsible recreation, or put climbers at risk - or both. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal or destruction of climbing routes.

Restricting or prohibiting fixed anchors removes climbing as an appropriate and safe way to explore Wilderness areas. This is inconsistent with the duty of Land managers to allow Americans to explore Wilderness. To maintain climbing as a way to explore and enjoy Wilderness, land managers must permit in-the-moment decisions that are necessary when navigating complex vertical terrain, such as when a fixed anchor is needed and must be replaced. Restricting or prohibiting fixed anchors will threaten America's rich climbing legacy and will stop current and future generations of Americans from continuing this legacy.

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.

Please do not allow "Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas" to stop Americans and climbers across the world from continuing to safely utilize Wilderness areas.

Sincerely,

Jack M. Cook