

Data Submitted (UTC 11): 1/16/2024 9:17:26 PM

First name: David

Last name: Reasoner

Organization:

Title:

Comments: Dear Sir or Madam,

I'm writing to express my concerns on the draft climbing management guidance issued Nov. 17, 2023. I have been a climber for over 20 years. I enjoy all aspects of climbing, from small local cliffs in Texas to wilderness climbing in the Wichita Mountains Wildlife Refuge in Oklahoma to wilderness climbing throughout the American west in National Parks, National Forests, and land overseen by the Bureau of Land Management.

The Wilderness Act states: "Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use." (Section 4b) Climbing with fixed anchors has always been an accepted recreational and historical activity in Wilderness Areas.

Fixed anchors are an essential part of the safety systems for climbing. If climbing anchors were to be prohibited, climbing in wilderness areas will not stop. The lack of anchors will result in safety issues and additional needs for search and rescue.

Climbing anchors do not meet the definition of an "installation" as defined in the Wilderness Act. Fixed anchors on a cliff face are far less of an "installation" than an equestrian trail or a hiking trail.

In many cases fixed anchors have been in place in wilderness areas for many years with no issues, and in some cases the anchors predate the Wilderness Act itself. Federal agencies, with support from the climbing community, have managed and authorized fixed anchors in wilderness areas for decades. New guidance policies prohibiting wilderness climbing anchors are not needed and are not acceptable. The proposed "Minimum Requirements Analysis" is not a feasible approach for new or replacement anchors. This adds unnecessary bureaucracy when land managers are already over-extended with their existing duties.

Thank You,

David Reasoner