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First name: Amanda

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Organization: New River Alliance of Climbers

Title: Outreach Chair

Comments: Dear Officials,

The New River Alliance of Climbers in Fayetteville, West Virginia strongly oppose the U.S. Forest Service (USFS) draft climbing management guidance (1/16/2024). If implemented as proposed, the guidance would create significant safety issues, threaten world-class climbing routes, obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape. As climbers, fixed anchors are essential pieces of our safety system that allow us to access vertical terrain safely and sustainably. Without fixed anchors, many of the wildest and most inspiring places in America would become inaccessible to the public.

With the utmost respect, this language is over-reaching and does little to recognize the historical value of wilderness climbing. Of note, there are likely 10s of thousands of fixed anchors installed in wilderness areas throughout the United States. In the Wind River Range, fixed anchors pre-date the establishment of the wilderness area with the earliest documented climbing in 1843 under Captain Fremont, directed to explore by the government contract. Explorational climbing burgeoned there in the 1920's and it continues to be an area of exceptional wilderness climbing. The Wind River Range received federal protection in 1931-32 and is now protected largely by three federal wilderness areas.

The U.S. has a long and treasured history of climbing on Federal lands, including wilderness and non-wilderness areas. In 2024, a prohibition of fixed anchors largely ignores roughly 200 years of historical, and often government-funded exploration of the raw and untouched lands of the United States. This proposal also creates over-regulation of wilderness areas by labeling fixed anchors as 'installations' under the same guise as a foot bridge or shelter. I can assure you that 'fixed anchors' are markedly different and represent life or death safety devices tantamount to human survival. Climbing in wilderness areas is ultimately a human-powered endeavor requiring an individual to carefully plan and manage their safety in the great outdoors. This empowerment of an individual to use hardware, when necessary, should not be over-regulated.

Furthermore, it is feasibly impossible for any government authority to manage, inspect, and document climbing hardware. As stated previously, there are potentially 10's of thousands of fixed hardware located in wilderness areas. In the past, I've left fixed hardware on remote granite walls to create a safe retreat during a storm. Under this new proposal, the hardware I left approximately 700' off the valley floor in risky climbing terrain would be subject to an MRA analysis...I doubt anyone would volunteer to endeavor this task.

We specifically oppose portions of the policy that regulate the replacement of existing anchors and ban the addition of new climbing anchors.

*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.

We encourage the USFS to work closely with the Access Fund to manage climbing anchors appropriately and safely on Federal lands. Thank you for the opportunity to provide comments.

Sincerely,

Amanda D. Smith
New River Alliance of Climbers