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Comments: Fixed climbing anchors should not become prohibited "installations" in wilderness. This new interpretation of the Wilderness Act goes against nearly 60 years of policy and practice.

Managers should not be required to perform a Minimum Requirements Analysis (MRA) for new and replacement fixed anchors. Every MRA decision document will open up the agency to litigation and the process adds an unnecessary bureaucratic step for managing sustainable climbing. Managers should not be expected to find funding and resources to conduct MRAs

Existing wilderness fixed anchors should not be removed, since their placement, maintenance, and use has been allowed for over half a century.

The proposed guidance presents a serious safety hazard. The policy to restrict or prohibit the placement or replacement of fixed anchors, unless specifically authorized through MRA determinations, takes critical personal safety decisions away from climbers. The MRA requirement for fixed anchor replacement is unprecedented and would result in unsafe conditions because timely, routine fixed anchor maintenance would be obstructed or prohibited by unnecessary red tape. Traditionally, land managers do not maintain fixed anchors, whereas climbers are responsible for assessing and replacing fixed anchors during climbing activities.

Land agencies do not have the resources to implement this unfunded, proposed mandate. The guidance requires that land managers must develop climbing management plans (CMPs), or other relevant plans, for each federal land unit. Nearly 30% of America's climbing, or about 12,000 discrete climbing opportunities, are located on US Forest Lands. There are currently very few CMPs in national parks and forests, and the agencies lack the funding and resources (and often expertise) to complete such plans. Understaffed and underfunded public land managers would be responsible for executing complex and resource-intensive requirements when they already have the authority to effectively manage climbing in wilderness.