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Comments: The US Forest Service has conserved resources and enabled responsible recreation throughout the lands it manages. The US Forest Service has a strong history with local climbing entities, such as the Red River Gorge, and has worked with local climbing entities to meet the USFS goals and conserve the land it manages. With the growing popularity of climbing bolstered by the inclusion of climbing in the Olympics, safe, fixed protection is necessary to reduce risk to visitors of USFS land - climbers and non-climbers alike.

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.

Models to rehabilitate old anchors and manage fixed gear has been shown in coordination with land agencies and local climbing entities. Beyond the Red River Gorge, in Boulder Colorado's Chautauqua Park, climbing is managed by the Flatirons Climbing Council which, in addition to managing fixed gear and anchors, works to conserve natural resources and manage stakeholder interests. This model of collaboration between climbing agencies and land agencies promotes safety and conservation.