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Comments: These rules should be modified to allow continued safe climbing access in parks across the country. Fixed anchors are necessary for safe climbing and are not prohibited "installations" under the Wilderness Act. Following existing policies regarding climbing anchors will better protect wilderness areas. In my over 20 years of climbing experience it is exceedingly rare that fixed anchors are placed in a way that would jeopardize the wilderness experience. On the contrary, the anchors are often hard to see, with minimal impact, and are placed sparingly. Climbers have a long history of self-policing when it comes to overuse or unsafe placement of fixed anchors.

It would be a tragedy and a major loss of historic wilderness recreation if existing fixed anchors were prohibited and required to be removed due to lack of resources to conduct MRAs, litigation, or unnecessary bureaucratic steps required to safely maintain existing anchors. Countless climbers have had life-changing experiences on established routes, that would become inaccessible or hazardous if this policy was enacted as written.

Critical safety decisions about anchor placement or replacement should not be controlled by a cumbersome authorization process, this should be in the hands of the climbing community. At times these decisions need to be made in the moment, and an MRA should not stand in the way of climber safety. This policy would prevent climbers from exploring wilderness areas in a safe and appropriate way.

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 among land managers and climbers. Non-wilderness climbing management policy should maintain opportunities for new anchors unless there is a specific identified cultural or natural resource that is documented to be protected.

Climbers in wilderness areas follow leave-no-trace ethics and are almost universally concerned with protection of the environment and wilderness experience. Indeed, they are some of the most ardent supporters of wilderness areas, and have been exploring these areas for centuries.

Climbers are the best people to regulate and maintain fixed anchors, and are the ones with the experience and knowledge to do so. These policies take that out of the hands of climbers and require land managers who often do not have the resources to create climbing management plans and conduct MRAs, and they often do not have the in-depth knowledge required. Land management agencies already have the authority to effectively manage climbing in the wilderness, and they do so in conjunction with local climbing groups adequately.

Thank you for your time and consideration.