

Data Submitted (UTC 11): 1/24/2024 7:04:42 PM

First name: Debi

Last name: Combs

Organization:

Title:

Comments: New policies proposed by the National Park Service (NPS) and the US Forest Service (USFS) are attempting to legalize rock climbing in wilderness areas. These proposed policies should be withdrawn. Any attempt to change policies to encourage rock climbing (e.g., permanently affixing climbing anchors) must be opposed for the following reasons.

The Wilderness Act prohibits installations and structures (e.g., permanent climbing anchors) to protect an area's wild character. Therefore, fixed climbing anchors must not be allowed in Wilderness.

The Wilderness Act's strict prohibitions, including the prohibition on installations, cannot be overcome by a desire to facilitate or enhance a particular form of recreation. The narrow administrative exception for such installations should be interpreted cautiously; it definitely should not extend to the general public seeking recreational activities in Wilderness. The agencies' primary duty is to protect Wilderness in its natural, untrammeled state, and the Wilderness Act's ban on installations can only be overcome in rare administrative circumstances where the installation is necessary to protect Wilderness in its natural, untrammeled state.

Agencies have no duty to develop Wilderness to provide "opportunities for primitive recreation." Wilderness, by its very existence, provides these opportunities-the agencies need only to protect the Wilderness according to the provisions of the Wilderness Act to safeguard the opportunity.

Climbing without permanent fixed anchors is generally compatible with wilderness preservation. While it may be true that fewer people will climb certain routes in Wilderness if they don't have fixed bolts or other permanently installed protection, natural limits on use is preferable when it comes to wilderness protection, particularly with the recent explosion of outdoor recreation uses in Wilderness.

For those climbers seeking developed climbing opportunities, there are ample permanently bolted climbs outside of Wilderness. Wilderness is an endangered landscape. Less than 3 percent of land in the Lower 48 is protected as Wilderness, and it is under threat, including from rapidly escalating recreation pressures.

Any specific proposals for permanent fixed anchor installations in Wilderness must be subjected to public notice and an opportunity for public comment pursuant to the National Environmental Policy Act.

Do not propose changes in policy that violate the intent of the Wilderness Act.