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Comments: With the rise in popularity in climbing, it's understandable that land management organizations would want to ensure wilderness areas preserve their character while allowing reasonable and discrete access and recreation. This is a challenging balancing act, and I don't envy your position. That said, I think the language in this proposal goes too far in the restrictions it places on climbing.

First, I think it's important to note that categorizing fixed climbing anchors as installations, and therefore prohibiting them, effectively bans climbing itself in many circumstances, unless they free solo up and down routes, which you might agree that few would want to become a widespread practice. Even when climbers place and remove all gear during an ascent, fixed anchors are often required to safely descend many formations where no viable walk-off option exists. As another example, many routes require at least sparse fixed anchors for belay stances, owing to the absence of natural features to place removable protection.

While the proposal appears to leave room for retaining fixed anchors that are already in place, in my opinion the language is too aggressive. It seems that anchors will only be allowed after a review determines they are appropriate, making the default action to prohibit access. I would humbly suggest modifying this policy to make it so access is granted by default, but to require removal of fixed anchors explicitly where it has been determined to be problematic. Practically speaking, it seems unlikely that any land manager would have the time or resources to conduct an analysis on all existing fixed anchors for popular climbing destinations, and it therefore seems that all climbing will effectively be prohibited indefinitely with this policy.

For what it's worth, I am in favor of policies that restrict the development of climbing routes to a reasonable degree in order to maintain wilderness character. For instance, continuing the prohibition of power drills in wilderness areas, or requiring fixed anchors to be camouflaged. I only urge you to consider enacting a policy that can reasonably be enforceable with your existing resources.

Thank you for your time!