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Comments: To Whom it May Concern,

In response to proposed US Forest Service policy prohibiting fixed anchors in Wilderness areas I am writing to strongly oppose such policy. Fixed anchors are critical components of climbing and mountaineering safety systems and have been in use in one form or another for more than 200 years. Moreover, fixed anchors are not considered "installations" under the 1964 Wilderness Act and are not prohibited as such.

It is an overstep of authority to create new policy prohibiting fixed anchors when existing policy has allowed and managed fixed anchors for decades. Imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community, creates safety issues. 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.

Land managers need to allow people to explore Wilderness in a way that permits the in-the-moment decisions necessary when navigating the high country in technical terrain. Maintaining existing fixed anchors and the adoption of new fixed anchors (especially in high traffic areas like rappels) not only reduces overall risk exposure as multiple groups can move through the terrain efficiently but also reduces visibility as a pair of bolts is much less obtrusive than a collection of slings strung here and there.

The proposed restriction of new routes to "existing climbing opportunities" on non-Wilderness lands is not only unenforceable but unduly restrictive. Non-Wilderness climbing management policy should encourage opportunities for new anchors unless there is an overriding risk to cultural and natural resources.

Finally, this proposed policy will restrict and erase America's rich climbing legacy on public lands. I ask you to adopt policy that promotes climbing access including the use of fixed anchors, both new and existing and does not add include unenforceable regulations or unrealistic management expectations. Public lands are for the public.

Thank you,
Courtney Shanahan