

Data Submitted (UTC 11): 1/26/2024 9:16:00 PM

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Comments: In the early '60s , already an avid hiker and beginning my lifelong involvement in climbing, I became aware of the pending legislation that became enacted as the Wilderness Act. From that time I became an active proponent of that legislation, contacting my representatives in Congress and also writing supportive articles in my high school paper and other publications. I have remained a supporter of the Act, as well as a frequent user of wilderness areas for my climbing activities, ever since, and have consistently supported the establishment of new wilderness areas. Throughout these six decades I have felt that climbing is one of the most appropriate and compatible activities consistent with wilderness values. I am also very aware, through much personal experience, that occasional fixed anchors in many situations are a necessity for climbs to be accomplished ( and descended) in a safe manner. I have never considered such anchors to be inconsistent with the appropriate use of the wilderness as recognized within the Act. As a climbing historian, I am also aware that the use of fixed anchors on many climbs within current Wilderness Areas, pre-existed the inclusion of many areas within the Wilderness System or even, in many circumstances, pre-dated, sometimes by decades, the passage of the Wilderness Act itself. Numerous other such anchors have been placed in Wilderness Areas even after their official designation as such, during the 60 plus years since it was enacted without being thought of as being improper installations. I am also aware that many of those who initially proposed the Wilderness legislation were the leading proponents while it was being enacted by Congress, were themselves climbers who had themselves utilized and, sometimes placed, fixed anchors in areas they were seeking to protect as Wilderness, both prior to and post the passage of the Act. They certainly didn't consider those fixed anchors, to be considered to be 'installations'.

I also note that the proposed regulations also address future climbing development in non-wilderness areas within Forest Service jurisdiction by limiting any further route development to areas already being used for climbing. This is a totally unnecessary and inappropriate proposal. Exploration is a central and organic aspect of climbing. It is absolutely wrong to so arbitrarily limit the future of climbing on public lands, especially when there are still many opportunities for further exploration on those, again public, lands.

I strongly request that these proposed regulations be immediately withdrawn and that any future regulations be drafted in an open and cooperative manner, involving representatives of climber advocacy organizations as well as other interested parties. Most importantly, the proposal that fixed anchors be considered to be 'installations' within the meaning of the Act should be removed, as should the limitations on future climbing developments in non-wilderness Forest areas

Thank you for your attention.

Alan Rubin