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Comments: To Whom it may concern.

I am writing to oppose the NFS' suggested guidance regarding climbing anchors and equipment. I am scholar of environmental policy, and have published on land use regulations for much of my career.

The climbing community has a decades long history of supporting appropriate environmental policies and stewardship while also developing a rich legacy of public land use. It is absolutely the case that NPS and NFS have noted that climbing is a legitimate use of wilderness areas, but these proposals will make that usage impossible and/or unsafe.

Fixed anchors are an essential piece of climbers' safety system, and are fundamentally different from the definition of installations in the wilderness act. Existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. 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.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades. Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. 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 amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

A better approach can be developed that appropriately addresses concerns for environmental protection and the wilderness character that also supports and buttresses America's rich climbing history.

Thank you for your attention.

Sincerely,

Professor Stephen Bird, PhD
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