

Data Submitted (UTC 11): 1/28/2024 4:17:07 AM

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Comments: Since 2008, the Friends of Indian Creek has worked to provide proactive stewardship of the world-class climbing in southeastern Utah. We work closely with land managers to educate climbers on low-impact visitation, build and maintain trails, encourage climber adherence to conservation policies (e.g. seasonal closures for raptors), and promote responsible climbing that preserves the landscape and decreases conflicts with other users of public lands.

As an organization, we firmly believe in the preservation of wilderness qualities, protecting natural and cultural resources, and the responsibility climbers have to be stewards of the places where we pursue our passion for vertical adventure. We are supportive of limited, place-specific policies to protect cultural and natural resources. However, blanket bans on climbing or climbing safety devices unfairly target climbers.

As such, we write to encourage the agency not to enact the current proposed rule that effectively bans fixed climbing anchors in wilderness areas. This rule is largely a solution in search of a problem that will decrease support for future wilderness protections, make climbing more dangerous, and accomplish very little to maintain the wilderness character of these lands.

Especially in southeastern Utah, where much of the climbing occurs on sandstone rock formations, eliminating fixed anchors will make climbing significantly more dangerous. Fixed anchors on top of climbing routes are often completely invisible from the ground but absolutely essential to descending a route safely. We can only imagine the horror a climbing party would experience if they were to climb a tower in a wilderness area only to find the anchors had been removed. The result would almost certainly be the need for climbers to leave protection devices (such as cams or nuts) in order to descend, which would defeat the point of removing the anchors in the first place. And how would land managers safely descend themselves after removing the anchors? Perhaps even more problematic, removing anchors would encourage climbers to attempt very dangerous descent techniques, such as wrapping ropes around trees or rocks, causing more damage to natural resources. Removing anchors would very likely increase the number and difficulty of climber rescues, draining Search and Rescue resources. In short, banning fixed anchors is likely to create dangerous situations while doing virtually nothing to improve the wilderness experience of any user group and also potentially increase environmental impact.

Most, if not all, of the developed climbing in existing or proposed Wilderness areas on USFS/NPS lands in southeastern Utah are in extraordinarily remote areas, where even climbers are very rare visitors. There is no evidence that the rare climbing adventure in these zones creates conflicts with other users or any significant natural or cultural resource impacts. Should such negative impacts occur, we are fully supportive of working with land managers to find solutions that are place-specific. However, a blanket ban would only serve to make climbing more dangerous and decrease respect for regulations, since they would be virtually unenforceable (as mentioned above that even managers couldn't remove anchors safely).

Overall, we see no evidence that the long history of wilderness climbing adventures in southeast Utah and around the country has created significant issues needing a solution at a national level. Where there are place-specific challenges, we encourage land managers to work with climbers and Local Climbing Organizations (such as ourselves) to address those issues in a collaborative manner. If bans are needed to protect local resources, those bans should be a last resort only after collaborative problem solving has failed.

Thank you for the opportunity to make these comments. We look forward to continuing to work with USFS to protect local resources and encourage safe, responsible climbing.