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Comments: The American Safe Climbing Association (ASCA), a 501(c)3 nonprofit founded in 1998, is the only nationwide climbing organization which focuses on the maintenance and replacement of older fixed anchors for climbing. These proposed regulations would have a dramatic and immediate effect on our mission.

Our mission statement (unchanged since the '90s): "The American Safe Climbing Association is a non-profit organization of climbers who are dedicated to making the sport of rock climbing safer by replacing unsafe bolts and anchors and by educating climbers, land managers and the public about climbing and anchor safety."

We consider the proposed regulations, with their new and unreasonable interpretation of the Wilderness Act, to be inherently poorly designed. Instead of reasonable natural & cultural resource decisions, which have been supported by climbers for decades, a "shotgun" approach of basically banning climbing is employed. Fixed anchors are required for nearly all rock climbing routes, whether for protection, anchor stations, or rappel stations for descent. Fixed anchors for climbing are tiny, hard to spot even when climbing, and to quote the Wilderness Act, "substantially unnoticeable." To suddenly ignore decades of precedent by requiring all existing (and future) fixed anchors be approved through lengthy (and unfunded) management processes is unreasonable (and a huge waste of time for land managers if funding were somehow to be secured). And it is likely to be a de facto ban on all rock climbing, depending on the whim of local land managers.

This would suddenly create a highly adversarial dynamic with climbers, who are some of the strongest proponents of protecting our natural lands. The Wilderness Act itself may never have been passed if it had not been championed by climbers such as David Brower.

Instead of a "shotgun" approach that would instantly make nearly all climbing routes illegal, it is much more reasonable (and a far better use of land manager funds and time) to continue to focus on natural and cultural resource regulation and research. All the tools necessary to regulate climbing are already available to land managers without this "shotgun" approach, and climbers have for decades respected closures due to raptors and other natural and cultural resource protection issues.

We are particularly concerned about the prohibition on replacing existing old, dangerous fixed anchors, which is the core mission of the ASCA. If regulated, existing anchors should be permitted without cumbersome and expensive review. Regulatory authority to protect resources already exists. And at a minimum, existing anchors must be allowed to be replaced without permitting - particularly when such permitting may never occur due to lack of funding. Prohibiting replacement is extremely dangerous for climbers, and will likely lead to more accidents, fatalities, and Search & Rescue missions. Even outside of Wilderness, section 2355.31.3 specifically says replacement would not be allowed: "Do not allow extensive or arbitrary placement and replacement of fixed anchors..."

To summarize, we find these new proposed regulations to be an overreach of regulatory power, disregarding the intent (and letter) of the Wilderness Act, and which will likely result in a de facto ban on rock climbing on USFS lands in the United States. This is despite the USFS statement (at the start of these proposed directives) that "Climbing has long been an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character..."

Please reject these proposed changes and instead continue to work with the climbing community, protecting sensitive natural and cultural resources on a case-by-case basis, instead of targeting nearly every climbing route in the country with a blanket ban.

Sincerely,

Greg Barnes
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