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Comments: Technical rock climbing is an integral, historic, and iconic part of recreating responsibly in America's wilderness. As a longtime climber and conservationist, I'm concerned to note that new proposed policies, such as treating fixed anchors as "installations" under the Wilderness Act, will dramatically affect the safety, accessibility, and environmental impact of rock climbing as a legitimate activity. For many decades, federal agencies such as the NPS and USFS have allowed, managed, and authorized fixed climbing anchors with success, and this has fostered cooperation from the climbing community, whose members view access to climbing as a privilege that they are willing to work hard to protect. New regulations subjecting anchors to minimum requirements analysis (MRA) place a crucial obstacle in the path of anyone who seeks to replace, update, or add anchors as safety may require.

Anchors are largely used to facilitate safe descent from certain climbs (or to enable rescue in the rare event of an accident), and decisions surrounding their use and maintenance are primarily dependent upon the immediate needs of a descending climbing party. Unexpected removal of anchors that would be reclassified as prohibited installations poses a true threat to anyone who wishes to climb conscientiously and safely, and this is hampered to an exceptional degree by increased levels of oversight (such as MRA).

Due to the nature of rock climbing as a sport, climbers already seek to minimize the impact, and even visibility, of their anchors in order to preserve pristine rock conditions, and the community actively seeks to explore America's vertical wilderness without resorting to modification of cliffs and crags. Navigating complex vertical terrain requires in-the-moment decisions that render on-the-ground application processes not just cumbersome but often infeasible. Subjecting anchor placement to minimum requirements analysis prevents these in-the-moment decisions, and slows the climbing community's ability to react to dangers that arise in the case of equipment that needs to be replaced or upgraded.

Crucially, the reclassification of climbing anchors as installations has the potential to render some of America's greatest climbing achievements inaccessible to future generations of climbers. The language of the new proposed policies needs to protect existing routes from removal rather than subjecting them to unprecedented scrutiny. Furthermore, restricting the establishment of new climbing routes to "existing climbing opportunities" will limit the ability of climbers to advance the activity and responsibly explore new vertical terrain. Non-wilderness climbing management plans should permit opportunities for new anchors unless analysis determines that climbing should be restricted to protect cultural and natural resources.