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Organization:

Title:

Comments: Dear Forest Service officials-

I am writing as a citizen that is concerned about the proposed draft climbing management guidance regarding a new interpretation of fixed climbing anchors (rock climbing, ice climbing and mountaineering anchors) as installations under the Wilderness Act. I am a strong advocate for wilderness and wilderness ethics. I would respectfully suggest improving the proposed guidance to allow appropriate use of fixed climbing anchors moving forward.

I respectfully disagree with the interpretation of climbing anchors as "installations" as defined by the Wilderness act. The proposed interpretation, in my read, does not match the intent of the definition of installations when the Act was passed.

Outside of definition issues, the execution of the proposed guidance would have several effects to your agency that would arguably be problematic. Prohibiting fixed climbing anchors is a significant safety issue. Adding any uncertainty to an already dangerous enterprise, especially one that has become mainstream, could cost lives as people will continue to climb existing routes with anchors removed or in dangerous conditions due to an inability to update the anchors. This is a serious issue I would ask you to seriously consider as you look forward.

Beyond the safety issue, as a cultural resource professional with twenty years of experience, I am also concerned issues and threats to America's rich climbing history and legacy. Countless historic climbing routes that would be impacted by such a climbing anchor ban. These routes likely qualify as historic properties under Section 106 of the National Historic Preservation Act. The removal of climbing anchors, could in theory, be interpreted as an adverse effect to the historic property as the route's integrity may be impacted. The use of these historic climbing routes, along with the maintenance of anchors, is similar to the ongoing maintenance of a historic building or the preservation of an archaeological site through stabilization. The impacts to such climbing route historic resources need to be considered as part of this proposed management guidance.

Beyond historic properties, I would suggest many of these historic routes may qualify as Traditional Cultural Properties. While the routes may not fit the traditional characteristics of a TCP, many of the community behaviors surrounding the use of the TCP over the historic and modern period should require consideration by your agency under NHPA. Generations of climbers have sought out these vertical pathways to participate in the passage rites of their predecessors and community leaders. These pathways are established and have existing infrastructure that contribute to their cultural status (e.g., anchors; landings; route guides; folklore; etc.). I would urge you to consider the impacts to potential Traditional Cultural Properties associated with climbing through the implementation of the proposed guidance.

Again, I am a strong advocate for wilderness and wilderness ethics. As you look to appropriately managing wilderness in the future, I hope you will take climber safety and cultural resource impacts seriously as you review the proposed climbing "installation" guidance. I would be happy to assist in any way regarding the consideration of climbing routes as historic properties or TCPs if needed. Thank you for reviewing and considering my comments and I send my best wishes.