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First name: Mary

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Organization: The Climbers of Hueco Tanks Coalition

Title: President of the Board of Directors

Comments: Dear United States Forest Service,

As the President of the Board of Directors for the Climbers of Hueco Tanks Coalition, I am writing on behalf of our organization to explain why we are opposed to prohibiting climbing gear being placed in wilderness areas. Our local climbing area is Hueco Tanks State Park, a National Historic Site. In our park, we have the largest collection of painted masks in North America and pictographs from over 10,000 years ago. People come from all over the world to visit for climbing and viewing the rock art. It is the largest and most frequented climbing area for bouldering in the entire United States but we also have a large amount of rope climbing that requires the use of anchors being placed into the rock.

For over 70 years, we have worked with the park Superintendent's and rangers, along with the local indigenous groups to allow for climbing and reverence in this space. Rock climbers are allowed to place safety gear where necessary, and we even go as far as painting it to better conceal it in the rock. This gear keeps climbers protected from dangerous situations and allows for recreational enjoyment while maintaining the beauty and sanctity of the space. The gear is minimally invasive, removable, and necessary.

Compared to the damage of natural lands by ATV trails, golf courses, ski resorts, biking trails, and numerous other athletic facilities, a few pieces of gear on a tall climbing face are nowhere near the same level of being invasive to the natural surroundings. Climbers bring tourism business to small towns across the globe and if their gear was banned it would be a catastrophic event for businesses in these areas who solely cater to the climbers.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following 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.

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 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.

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.

Thank you for your consideration.