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Comments: While the goal of protecting America's Wilderness areas is admirable and necessary, as a climber I do not support this way of pursuing that idea. Fixed anchors are important safety equipment for climbers, allowing for the ascent, and more important, safe descent, of routes. There are well-known accident reports where the primary failure was due to a (former) temporary anchor used during an emergency scenario, left in place, and then later failing in another emergency in an area that did not permit fixed anchors. Current climbing policies allow for reasonable use of fixed anchors that protect climber safety while still keeping the character of the Wilderness areas. Changing these policies so quickly and significantly is unreasonable for the many users of these recreation areas and those who have spent their time and money improving, maintaining, and preserving these areas.

I believe part of the necessary character of Wilderness exploration is the need for it not to be pre-planned. If all fixed climbing anchor placement in Wilderness areas required prior documentation on its location, future exploration would be limited with climbers being unable to make important decisions while on the wall of directions to take. Without the option to leave their choices open, climbers would be restricted from choosing certain objectives due to the safety concern of a meticulously pre-planned route being required. Most of those decisions cannot be completed ahead of time from the ground.

Prohibition or potential removal of climbing routes made possible by fixed anchors also threatens to erase decades of American climbing history. US federal lands contain sites that are the locations of some of the most historic climbing events that shaped the path of many climbers across the country and even the world. The connection to history (in both the very recent and more distant past), and the ability to take that and build on it, is an important part of the growth of individuals and the sport as a whole. Existing climbing routes must be protected from removal under these procedures to allow this growth to continue.

Local land managers do important work and are best positioned to understand the particular needs of their managed area, but the reality is that they already have a lot of work to do, and frequently not enough staff to do it. I am concerned that the addition of assessing and managing climbing route installations to their duties will result in a serious reduction in the amount permitted just due to the workload. It is important for climbers to have the ability especially to maintain existing fixed hardware as necessary - this prevents accidents and (among other things) increased use of SAR resources.

Restricting climbing to existing areas only on non-Wilderness lands is confusing, subjective, and unenforceable. Climbing should be continued to be allowed in new areas unless there is a particular need to restrict it due to existing culture, natural, or other environmental resources that need to be protected. Climbers have shown respect for temporary and permanent closures for these reasons in the past.

Again, protecting Wilderness is important, but it should be done with the help of climbers, rather than protecting wilderness from climbers. Fixed anchor installations are very low impact compared to much Wilderness use and compared to other parts of the climbing process, such as trail use and camping. Working with climbers (and local climbing organizations) is the correct path forward for protecting Wilderness areas.