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Mr. Semler and Mr. Mali:

The undersigned organizations respectfully submit this comment on the National Park Service (NPS) and U.S. Forest Service (USFS) proposed guidance on the management of climbing in designated Wilderness. The signatories are submitting this letter in identical letter form to both agencies.

The signatories plan to submit individual comments on the substantive components of the agency guidance proposals issued in November. We have come together in submitting this joint comment to emphasize our collective agreement that the proposed guidance is highly problematic. We believe the implementation of this guidance would create profound problems for the climbing community and a strong backlash against Wilderness conservation.

For these reasons, we write to jointly recommend that the agencies modify the guidance implementation process described in the November 17, 2023 notices. We recommend that the Departments of Interior and Agriculture jointly charter a Federal Advisory Committee to advise the Departments on the development and implementation of the guidance. Doing so will facilitate more collaboration with stakeholders and will produce a more viable and equitable implementation plan.

Toward that end, the signatories to this letter have agreed on the following core principles:

1. The proposed NPS/USFS guidance would impose limits on climbing practices that have been allowed since the Wilderness Act became law in 1964. Under these circumstances, fairness considerations require the agencies to develop an implementation strategy that will produce certainty on a reasonable timeline and that is equitable and transparent to the climbing community.
2. Unfortunately, the proposed NPS/USFS guidance for managing wilderness climbing anchors is highly impractical and will require analyses and plan development that will take many years, if ever, to complete. Many of the provisions in the guidance raise significant safety concerns and stand to threaten the closure of iconic existing climbs in NPS/USFS wilderness areas.
3. The NPS/USFS proposals mandate lengthy and expensive land use plans and MRA processes that will be very costly and time consuming. Despite this fact, these mandates come with no additional funding. By imposing mandates without additional funding, these proposals will produce de facto moratoriums on wilderness fixed anchors across the country that will be highly unpopular and unenforceable.

4. The NPS/USFS proposed guidance documents are impractical for the additional reason that they set forth conflicting mandates (e.g., Director's Order 41 may require prior authorization for anchor replacement, whereas proposed Reference Manual 41 would require prior authorization for anchor replacement). For that reason, they create significant uncertainty and are unfair to the climbing community.

5. The NPS/USFS proposals are unpopular with Congress and have prompted Congress to move climbing policy legislation out of committee with unanimous bicameral and bipartisan support. To date, this legislation has been limited, but the agencies' guidance proposals may encourage Congress to take even more assertive legislative action.

6. The NPS/USFS proposals are highly unpopular with the outdoor recreation community, which has historically supported conservation initiatives such as wilderness designations. These proposals will drive a wedge between these two overlapping constituencies making it much more difficult to generate support for conservation initiatives.

Because of these fundamental realities, implementation of the guidance as proposed will produce years of uncertainty and a long litany of inequitable results. What is called for is greater collaboration on both the substance of the guidance and the plans for implementation of its terms. We see no way for the existing process to lead to the collaboration that will be necessary to avoid these problematic results.

There is precedent for greater collaboration on the management of fixed anchors in designated Wilderness. In 2018, representatives of the federal agencies and the climbing and conservation communities met in Tucson, AZ to discuss ways to manage Wilderness climbing and fixed anchors. This multiday meeting featured productive dialog on a wide range of climbing issues. Participants made substantial progress on strategies for implementing reasonable controls on the deployment of fixed anchors. Unfortunately, for reasons unknown to us, this collaboration process was abandoned.

We urge agency officials to restart that collaboration process now by chartering a joint DOI-USDA FACA Committee to develop and implement more viable and equitable guidance on the management of fixed anchors in Wilderness.

Thank you for allowing us to comment on the proposed guidance.

Sincerely,

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