

Data Submitted (UTC 11): 1/30/2024 8:40:26 PM

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Comments: I vehemently oppose the new draft plan language that classifies fixed climbing anchors as prohibited installations, requires a Minimum Requirement Analysis to make any adjustments to even existing fixed anchors, and seems to serve as a de facto ban on even already existing fixed climbing anchors of any type in wilderness settings.

While I am by no means a proponent of unrestricted and unregulated additions of new fixed climbing anchors to wilderness areas, I am an avid wilderness climber in the NC Linville Gorge and beyond, and see this language as detrimentally restrictive to the climbing safety of routes people have been climbing in wilderness areas for decades. It will, in the stroke of a pen, remove a rich recreational cultural history of rock climbing in the United States, one with decades of history being managed successfully as they already were, before these proposed changes. Climbers already limit the use of fixed anchors in wilderness areas, but there are many existing and iconic routes that have some limited fixed gear in some places because of safety, and further, there are many emergency climbing situations in which a climber or rescuer may need to set fixed gear to get out of a dangerous emergency. Hopefully that gear can later be retrieved, but setting a ban on fixed gear of all kinds takes that emergency, in the moment decision making out of a climber's hands. Removing existing fixed anchors on many historic routes, or disallowing local climbing groups from maintaining them (as local land managers generally lack resources to do so, many local climbing groups already exist and work proactively with local land managers to maintain fixed gear), will also create serious safety situations for climbers who might not be aware of the changes and who depend on the gear that was historically present.

Fixed gear can also be a tool to reduce impact in an popular area, as climbing up to and rappelling from anchors can in some situations create less impact on the environment than large numbers of people placing and then removing temporary anchors around trees or shrubbery. In addition, lowering from fixed stations is often a lower impact activity than climbing up and over the tops of sensitive cliff-top ecosystems. A blanket ban on fixed gear ignores this sensible, case-by-case conservation approach that has already widely been deployed in existing wilderness routes in favor of viewing all climbing as negative impact, a position that does not reflect a nuanced understanding of how climbing works.

Banning fixed gear in such a way that includes existing fixed gear creates an unfunded mandate for land managers to remove the gear, a serious safety situation for those trying to remove it (who have to take on the safety risks of the gear not being there to do so), creates a safety risk for climbers who will not be deterred from climbing routes with iconic historic history, and removes a conservation tool to reduce impact in some of these areas. It unfairly limits a rich recreational activity that was previously allowed for decades, a recreational activity that is no less valid than any other permitted recreational activity in the wilderness.

Climbing groups have a long and successful history of working with land managers to limit the impact of climbing and also ensure safety, and often provide the resources (time, equipment, knowledge) that land managers don't have, in order to do so. There is no need for these changes, and indeed, in some cases these changes will increase rather than reduce the environmental impact of climbing.