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Comments: I have been climbing for fifty years, and presently serve as the President of the Washington Climbers Coalition (WCC). On behalf of the WCC, I am writing to comment on the current proposals, including the National Park Service's proposed revision of Reference Manual 41 and the Forest Service's proposed revision of the 2355 Forest Service Manual.

The proposals address what are termed "fixed anchors." Climbers have been attaching hardware to rock faces for hundreds of years but what we mean by this term in modern usage includes the use of slings, cord, pitons (metal spikes), and bolts (metal anchors inserted into holes drilled in the rock). They have been used in their modern form in the United States for approximately 90 years.

We recognize that the proposals for the Forest Service and the Park Service are not the same and that, in particular, the Forest Service proposal directs the management of fixed anchors outside of designated Wilderness, whereas the Park Service proposal does not. However, our general comments about these current proposals are applicable to both. Our concerns include the following:

1. We do not believe these proposals are practical. They mandate extensive planning and management efforts be undertaken by agency staff who are already stretched thin. Both the Forest Service and the Park Service struggle to maintain public facilities including roads, trails, and even visitor centers and ranger stations. Law enforcement and administrative personnel struggle to keep up with the increased pressure from recreational use, salmon recovery mandates, and such local problems as timber theft and dumping. The proposal contains no funding. We do not know of any staff members at the local level who look forward to being saddled with this burden. We also believe they do not have the expertise or knowledge to enforce these policies: rope access work is dangerous, requires expensive and time-consuming certifications.

2. The 1964 Wilderness Act provides for "unconfined recreation," and climbing is a traditional activity on public lands in the United States. While we recognize that these agencies have an obligation to steward our public lands, and that climbing may have a deleterious impact in some situations, the agencies should undertake the minimum amount of regulation necessary to address what we acknowledge are legitimate concerns. Climbing takes place on naturally resilient rock faces so that the impacts are minimal when compared with many other activities on Forest Service and Park Service lands - including recreational use and management activities. A broad-brush policy that requires all parks and forests where climbing takes place to develop climbing management plans and which establishes a presumption that fixed anchors are not permissible under the Wilderness Act is not tailored to meet a specific concern. These proposals fly in the face of 60 years of recreational management under the Wilderness Act.

3. These proposals would designate fixed anchors as installations under section 4(c) of the Wilderness Act. Section 4(c) bans installations but it has an exception for installations upon completion of what is termed a "minimum requirements analysis." The section contains the following:

There shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any wilderness area.

Climbing anchors should not be declared "installations" under this provision. They were in place throughout the United States when the Wilderness Act was first adopted and, while the act does not define the term, "installation" is clearly referring to items having a much greater impact than a tiny piece of cord or metal affixed to a rock face. An analogy lies in the example of trail signs: they are "installations" under the plain English definition of the term, but nobody seems to be arguing that these are installations under this provision - and therefore subject to presumed ban. The agencies regulate the installation of trail signs, determining what materials may be used and how intrusive they may be and even moving or removing them to serve recreation management purposes, but they are not deemed "installations," under section 4(c). Fixed anchors can be categorically allowed but still managed under other authority.

4. As noted above, these proposals dictate that the local units devise climbing management plans, and they also dictate that the agencies complete "minimum requirements analysis" of all existing and proposed new fixed

anchors within their jurisdiction. This analysis would entail a determination whether these anchors constitute the minimum required tool to serve the recreational need and would include a consideration whether there may be similar and suitable opportunities nearby. This analysis was dictated with an eye toward requiring land managers to determine whether substantial projects are compatible with Wilderness values and has applied to such projects as installing a trail-bridge within wilderness areas. It has not been applied to activities undertaken by the public, and this requirement would expose the agencies to litigation: in 2012, the Forest Service lost a lawsuit over their alleged failure to properly complete the minimum requirements analysis in connection with their repairs to an existing historic fire lookout. There are some in the conservation community who view recreational use as generally incompatible with wilderness preservation efforts and these groups could be expected to take advantage of such requirements to try get the Forest Service and the Park Service to clamp down on this activity which they see as a threat to their core values.

5. These proposals indicate that, after completing the required planning and analysis, the agencies will be tasked with removing fixed anchors that are found incompatible. Fixed anchors are necessary for technical rock climbing and virtually all climbers rely on them to some degree (they are essential for a safe descent even if not used during the ascent of rock faces); any removal of them will make climbing more dangerous, limit the accessibility of climbs to a small fraction of climbers, and, in some cases, render climbing impossible. I have been a supporter of public lands and wilderness preservation all my life; these proposals risk pitting climbers, who are natural allies of Wilderness land managers, against them.

6. We believe that the agencies have authority to regulate climbing and the use of fixed anchors under current provisions. There have been some controversies and complaints when these agencies have gotten involved in regulating the use of fixed anchors at such various locations, such as the North Cascades National Park, Yosemite National Park, and the Sawtooth National Forest, but these challenges - including the 1998 Forest Service ban on fixed anchors in designated Wilderness areas and the following doomed "negotiated rulemaking process" - demonstrate that these issues are difficult and that a nationwide policy may prove elusive - but they don't suggest a presumption that fixed anchors are incompatible with Wilderness. They suggest a more nuanced approach.

As noted above, climbing is inherently a relatively low impact form of recreation and we, along with other local and national climbing organizations work with land managers across the country to collaborate on policy formation and climbing management plans. We look forward to continue doing so. We are not opposed to regulation, but we are concerned that these proposals are ill advised and perhaps even uninformed.

Thank you for giving us the opportunity to comment on these important proposals.