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Title:

Comments: Hello,

I write to use as a concerned citizen and a climber. I am a member of the American Alpine Club and I have climbed recreationally in the Northeast, Mid-Atlantic, California, Nevada, and Pacific Northwest for over ten years. I became aware recently through climbing media that there are proposals that would classify new and existing fixed climbing anchors as prohibited installations in Wilderness areas.

There are many reasons why I am concerned about this proposal and I hope that the draft proposal is rejected and that these measures are reconsidered. There is a rich history of climbing in US Forest Service land across the country. It is my understanding that the USFS and climbers in regions across the country have worked together more and more over the years to ensure that climbing is safe, accessible, and respectful of the natural environment. Fixed anchors exist for Wilderness exploration just as hiking trails exist for Wilderness exploration. I don't think it is the USFS' intention to limit or prohibit climbing by drafting these proposals but the prohibition of fixed anchors actively makes climbing less safe. I think this proposal could lead to 1) more accidents, 2) a greater strain on rescue teams, and 3) more dangerous and inconspicuous climbing trends with the goal of circumventing USFS regulations. I also think that 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.

Just as there is a long history of climbing on Forest Service land, the climbing community has a long history of developing and enforcing its own climbing ethics and acceptable practices for the establishment of new climbs (first ascents). Fixed anchors are an essential part of these debates over ethics and practices vary from park to park and climbing area to climbing area. I think the climbing community - with the help of the Access Fund, the American Alpine Club, and the American Safe Climbing Association - has done an admirable job of determining when and where new anchors are warranted to maintain the safety of future climbers on new and existing routes while maintaining the integrity of the rock and ethics of an area. What is deemed acceptable at the Shawangunks in New York is different from what is acceptable in the New River Gorge in West Virginia.

I urge the US Forest Service to reconsider this proposal as it currently stands. It goes against 60+ years of precedent of allowing fixed anchors under the Wilderness Act. I would love to recommend some alternatives to the proposal that accomplish USFS' goals, but it is not clear to me what the goal is other than to limit climbing altogether and force it back into a counter-cultural activity that rebels against state authority. Again, I don't think that is your goal. Perhaps the Forest Service widens the requirements for climbing permits (ideally \$0 reservations) to reduce erosion and destruction of delicate natural habitats? The Boundary Waters Canoe Area Wilderness requires that entrants watch a video about how to "leave no trace" before entering that pristine wilderness area. Perhaps something similar is necessary for climbing on Forest Service land. I know for sure that prohibiting fixed anchors will do more harm than good and I am concerned about the consequences for safe climbing that these proposals portend.

Thank you for reading my comments,

Chris Kramer

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