

Data Submitted (UTC 11): 12/1/2023 9:09:51 PM

First name: Karen

Last name: Burke

Organization:

Title:

Comments: I am writing to assert my option that fixed anchors in wilderness areas should not be considered "installations." I believe this to be true because of the historical precedent, historical intent, interpretation of the Wilderness Act, congressional action and the inability of land managers to implement the change. Since the inception of the Wilderness Act almost sixty years ago, fixed anchors in wilderness have not been considered "installations". In addition, many of these routes and their fixed anchors were established before their wilderness designation and should be protected as a cultural resource because they are over fifty years old and are part of the American legacy. I believe that this historical precedent needs to be acknowledged and that it is unfair and a dangerous burden to climbers to reverse it. Secondly, I feel that the historical intent of the Wilderness Act didn't consider fixed anchors as "installations" because of the use and placement of fixed anchors by many of the people involved in creating and passing the Act. Many of those people, such as Stewart Udall, Bob Marshall and David Brower, were avid climbers who themselves relied upon fixed anchors and it was from their experience climbing in these wild places that they were inspired to create and pass the Act. Many of the first Wilderness Areas established in the original 1964 Act included climbing areas with fixed hardware. In addition, the interpretation of the Act should not consider fixed anchors as "installation." The removal or changing the classification of fixed hardware would be a violation of the act as it states that those areas "shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness" and that these areas have "outstanding opportunities for solitude or a primitive and unconfined type of recreation" and contain "historical value." Furthermore, Section Four of the Act states that it is "supplemental to the purposes for which national forests and units of the national park and wildlife refuge systems are established and administered" and it reiterates that "wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use." Fixed anchors fall under both the purpose of recreation and historical use for the United States Forest Service and the National Park Service. Also, labeling fixed hardware as "installations" would be conflicting with congressional action. The Protect America's Rock Climbing Act, which states that fixed hardware should not be considered as "installations" in wilderness areas, was passed this year unanimously by bipartisan committees in both the House of Representatives and the Senate. Lastly, classifying fixed anchors as "installations" will have an overwhelming burden placed on land managers. The amount of work, time and energy it would take to inventory existing fixed anchors in wilderness areas would be unattainable to achieve by land manager with their current funding. Furthermore, the amount of work, time and energy to approve or deny fixed hardware as an "installation" would be nearly impossible and would lead to unfair restrictions and dangerous conditions for climbers. Additionally, land managers should recognize fixed anchors as a traditional and minimal tool. How would land managers respond to climbers who had to install fixed hardware for their own survival? In a scenario where Federal land agencies consider fixed hardware as "installations," existing fixed hardware should be grandfathered in and be an acceptable practice for climbers if their safety depends on it. In conclusion, fixed hardware should not be considered as "installations" in wilderness areas because of the historical precedent, historical intent, interpretation of the Wilderness Act, congressional action and the inability of land managers to implement the change and so that current and future generations are allowed to experience climbing in these iconic and truly special places.