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Title:

Comments: I have been a dedicated climber for nearly fifteen years and cherish America's wilderness areas for their unadulterated beauty, their wildlife habitats, and their recreational opportunities. I want to see these public lands preserved for generations to come. Banning bolts and fixed anchors would have a negative impact on wilderness areas and work against our collective goals for preservation.

Banning bolts would negatively impact wilderness areas in several ways: climbers would use trees as anchors, which is unhealthy for the tree and root system, or descend off-trail, impacting sensitive cliff areas and animal habitats. A ban would also pose a serious threat to human health and safety. Without fixed anchors, climbers take on unnecessary risk in both ascending and descending climbs. Climbing is growing in popularity every year and a lack of bolts and fixed anchors will endanger new climbers in particular.

In addition to the notes above, the Access Fund offers the following warnings about a unilateral bolting ban:

\*Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

\*It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

\*Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

\*Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

\*Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

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Thank you for your consideration, Alissa Doherty