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Comments: Hello,

My name is Michael Bonnet. I am an avid climber and outdoorsman, having been calling the outdoors home for over twenty years and having made climbing my life. I live in Southern California but climb all over the country, in both wilderness and front country. These are my comments on proposed changes to policy regarding fixed anchors for climbing.

Fixed anchors serve a wide variety of purposes and endeavors. They not only enable recreational rock climbing as we see across public lands today, but also traditional mountaineering and highly technical hiking/scrambles. This essential safety equipment is key in enabling a diverse array of outdoor activities, and keeps the burden on public workers and emergency services to a minimum by minimizing the potential for serious or even fatal accidents.

Fixed anchors are an essential piece of climbers' safety system and have never and currently 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. Furthermore, a massive policy change like this will take a long time to filter through at times isolated communities of climbers and mountaineers, possibly leading to widespread confusion and run-ins between community members and land managers/law enforcement that will do nothing but harm to the good working relationships currently seen.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility voluntarily undertaken by the climbing community at no cost to land managers. Regarding already existing fixed anchors, if continued personal initiative-based replacement of old, insecure, or otherwise unsafe fixed anchors is not feasible, the activity should be subject to shall-issue permits, so that they are well-tracked and not necessarily replaced at a whim.

Regarding placement of new fixed anchors, prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Climbing is a rapidly-growing outdoor activity in America and across the world. Climbing in Joshua Tree National Park has more than doubled since 2010. From 2010 to 2022, the number of climbing gyms in America went from less than 300 to well over 600. As the sport grows, the usage rate of existing climbing areas ("crag") increases dramatically, leading to potential environmental and safety concerns. Development of new climbing areas is key to spreading out these effects, helping both the climbing community and land managers more effectively maintain these beautiful areas.

Think of it like interstate highway usage in America. A 9-ton big rig, despite weighing 4.5 times as much as the average average car (18,000 lbs vs 4,000 lbs), does over 410 times as much damage to a roadway from the all-at-once effect of its presence. Likewise, high concentrations of climbers in a limited number of crags (a decreasing number, even, if fixed anchor replacement becomes forbidden) will place incredibly high pressures on those few crags. Fixed anchors are key to developing new routes in new climbing areas, spreading out the inevitable impact of growing numbers of climbers in America.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. America is the epicenter of climbing in the world, and our nation is all the better

for it. Climbing management policy needs to protect existing routes from removal except in cases of extreme safety hazards, and promote development of new routes and new crags so that widespread availability of safe climbing conserves beautiful wilderness areas for us all.

Thank you for reading and for your consideration.

Best,

Michael Bonnet