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First name: Lane

Last name: Mathis

Organization:

Title:

Comments: For the last 60 years climbing in the United States has relied on fixed anchors inside wilderness areas. The age of free climbing left explorers and athletes alike climbing steep walls that contained no walk-off opportunities. Walking to the top was losing its appeal in favor of a more athletic form of climbing. The technical ability of free climbers grew and by the 1980s big wall free climbing was taking off. This means that climbers were able to not only free big routes but they were doing so at difficult grades. In some cases this would be impossible or deadly without fixed hardware. Those early climbers along with the USFS set the cultural standard for all modern climbers.

Who put those routes up there? Experts of the craft have been developing big wall free climbs throughout America for decades. There is a rich history and ground-up ethic when exploring a new big wall. The Painted Wall in the Black Canyon of the Gunnison is a fine example. It's over 2000 feet tall and the ground-up ethic in the park is staunch. This means one must start at the ground and make upward progress "one step at a time." Exploring this type of terrain is bold and the cultural significance of that cannot be overstated. MRAs make this type of exploration impossible. Climbers rely on moment to moment decisions in order to navigate dangerous and potentially fatal terrain. Anecdotally, it's quite possible that I'd have perished in 2021 along with two partners if we had to operate under the restrictions of the current proposal.

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Aside from this very specific use case, I also present the following:

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 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.

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. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.