

Data Submitted (UTC 11): 1/6/2024 5:14:18 PM

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Comments: Dear USFS,

I have been an active rock climber for 45 years and the proposed ban on fixed anchors on federally managed wilderness lands is very concerning to me. Climbing is a well-established traditional recreational use of our national parks and wilderness lands and this use often predates the creation of wilderness lands.

The Access Fund (a climbing oriented advocacy organization) has articulated 5 principal objections to a blanket ban, summarized below:

- 1) Fixed anchors are a part of climbers' safety equipment and are not prohibited "installations" under the Wilderness Act.
- 2) It is not necessary for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors when they have been allowed and managed for decades.
- 3) The prohibition of fixed anchors will create safety problems in the maintenance and management of existing anchors on climbing routes. It will also make it difficult for search and rescue teams to conduct their activities.
- 4) Prohibiting fixed anchors creates unnecessary hurdles to access certain Wilderness areas.
- 5) Prohibiting fixed anchors will threaten America's historic climbing legacy.

To the above I would add a 6th reason. Prohibiting fixed anchors may lead to increased impacts on wilderness lands. If fixed anchors are not allowed, to descend from a climbing route will require scrambling to the very top of the cliff and traversing to a suitable gully. In addition to the safety hazards inherent in passage across terrain littered with loose and unstable rocks, the cliff-tops and gulleys will see additional traffic and disturbance possibly leading to more trails and erosion.

I am aware that the recent large increase in numbers of climbers and bolt-protected routes "sport climbing" is an issue of concern. Many climbers would agree that that "sport climbing" should not be allowed in wilderness, but this should not be transformed into a policy of no fixed anchors whatsoever, which goes against a traditional established land use.

Existing land management policies have allowed judicious use of fixed anchors for more than a half century. Continuing this approach will do more to protect Wilderness character and provide for primitive Wilderness climbing than an outright ban. Reasonable policies that are locally managed based on the characteristics and needs of an area are usually the best suited and easiest to actually implement and enforce with community buy-in and support.

If the reason for the desire to regulate climbing and fixed anchors is to minimize environmental impact then that is a laudable goal. However, the impacts of fixed climbing anchors should be fairly judged next to other significant uses that are condoned in our forests and wilderness lands, such as trail construction, campsites and signs.

I hope these comments convince you to reevaluate your proposed policies

Sincerely,

Stewart Middlemiss, PhD