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Comments: As a technical canyoneer, I've had the privilege of getting to experience wilderness in ways in which bring me closer to nature, make me want to protect it, and make me want to fund the administration of it. Unfortunately, the new fixed anchor proposals threaten these experiences, and I urge that they are rewritten. Fixed anchors used in canyoneering and climbing have been allowed and regulated for decades; and though I am a proponent of regulation, this (seemingly well-intentioned) proposal is flawed in one key way. This proposal assumes that fixed anchors are inherently illegal unless proven innocent, and this must be changed.

This is a new interpretation of fixed anchors, and conflicts with access to "primitive and unconfined recreation." Climbing (and canyoneering) are legitimate and appropriate uses of wilderness, but removing the basic tools of the sports conflicts with the intent of the Wilderness Act itself. Fixed anchors (unlike roads, helicopters, etc.) are not prohibited installations under the Wilderness Act. We know this because senators like Mark Udall (who was the primary sponsor of the Rocky Mountain National Park Wilderness and Indian Peaks Wilderness Expansion Act) are coming forward saying that "nothing in those bills was intended to restrict sustainable and appropriate Wilderness climbing practices or prohibit the judicious and conditional placement of fixed anchors - many of which existed before the bills' passage."

If fixed anchor replacement requires an MRA, this is a huge safety issue. As it is now, fellow canyoneers, climbers, backcountry skiers, and river sports enthusiasts can replace dangerous anchors in a timely manner to maintain safe routes. If that replacement takes an extended time, people will get injured or routes will be unnecessarily closed while waiting for the administration to find funding (which by the way this proposal doesn't provide).

Without the use of a fixed sling in a canyon called Shenanigans, my partner and I would've been stuck at the last rappel, have had to have called for a rescue, and maybe have been injured or worse. Instead, because of its presence my partner and I were able to make safe passage through an otherworldly slot canyon. Though left by man, the sling allowed access to the most remote wilderness that I have experienced, and thus helped instill a desire to protect the land. In a time where access of outdoor spaces is becoming increasingly difficult, I sincerely believe that experiences like mine were the intent of the Wilderness Act. Policies prohibiting the use of fixed anchors would deny that experience to other people by making most technical canyons unfeasible to descend. This obstructs the appropriate exploration of wilderness areas; not only by making known canyons inaccessible, but also by denying the opportunity for exploration of unknown ones. It is impossible to know what anchoring opportunities exist in an unknown canyon (or on a cliff face) before actually descending or climbing it.

At a minimum, I request that there is a grandfathering-in of all existing anchors, no anchor removals, and a stipulation that all existing anchors can be replaced one-to-one without review. This helps maintain current routes for future generations and (most importantly) helps routes stay safe with up-to-date fixed anchors. I also believe that we should reserve in-the-moment safety decisions to canyoneers and climbers by authorizing them to construct unplanned fixed anchors to retreat from route. Though this minimum would help manage current routes, if just these were enacted, it would still kill any hopes of exploring new technical canyons or mountain peaks without a walk-off. That is why, most of all, we cannot treat fixed anchors as prohibited "installations" under the Wilderness Act. By following existing policies (such as no power drills) that allow judicious use of fixed anchors we can simultaneously protect Wilderness character and provide for primitive and unconfined Wilderness exploration.