Data Submitted (UTC 11): 1/20/2024 8:21:20 PM First name: Damon Last name: Vaughan Organization: Title: Comments: Dear USFS personnel,

I'm writing to strongly oppose draft guidelines for wilderness and non-wilderness climbing management that would restrict the use of fixed anchors. Climbing is explicitly recognized as an appropriate use of public lands by the NPS, the USFS, the BLM, and a growing number of states. However, climbing is impractical without the use of fixed anchors. Descending from a climb requires that something is left to safely lower from.

To be clear, routes with excessive bolts, particularly if installed with power drills, are clearly incompatible with Wilderness. However, many climbs that are very compatible with Wilderness, such as those on El Capitan in Yosemite or in remote reaches of the Wind River Range, would be affected by the proposed legislation. Many of the climbs of the latter nature were established before the Wilderness Act itself. I feel like these two types of climbing often get conflated in these discussions, where climbers tend to make arguments only acknowledging the sparsely-bolted routes, and opponents of climbing speak mostly about the over-bolted sport routes. I would welcome some regulation to prevent the over-bolting of Wilderness, but this current act is not the right way to go about it because it is too restrictive and does not acknowledge the subtleties.

The idea of applications for anchors in wilderness areas (the MRAs) makes sense in theory, but is impractical to actually carry out. With public agencies already being under-funded and with so much money going to wildfire suppression (which is of course important, but nonetheless leaves little remaining), how would the agencies fund this?

Furthermore, fixed anchors promote safety. In the absence of safe permanent anchors, climbers will leave webbing slings to descend. Not only are these more of an eyesore than bolts, they are susceptible to degradation by the elements over the years and may fail, leading to catastrophic accidents.

Climbing can be an incredibly beneficial activity. I owe much of my self confidence, my direction in life, and my appreciation for nature to the activity. It was climbing that originally brought me into the wilderness (not just "capital W" Wilderness but wild lands in general) and really helped to determine my career path as a forester. I hope that future generations will continue to be able to have the same opportunities that I did. That's why I'm speaking out against the proposed legislation. Thank you for reading my comment.

-Damon Vaughan