Data Submitted (UTC 11): 1/22/2024 9:00:24 PM

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Comments: Both the National Park Service (NPS) and the U.S. Forest Service (USFS) have issued proposed

policies governing rock climbing in the designated Wildernesses that the agencies administer.

Unfortunately, both agencies propose policies that elevate recreation above wilderness protection and permanently scar and degrade Wilderness through the installation of fixed climbing anchors.

Rock climbing without permanent fixed anchors is generally compatible with wilderness preservation. Using removable protection like slings and chocks is also generally compatible. But permanent fixed climbing anchors, like bolts and pitons permanently pounded into Wilderness rock faces, diminish an area's wild character. Not only are such installations lasting signs of human development, but they also attract and concentrate use-at great expense to native plants and animals for whom Wilderness is often a last, safe refuge.

Contrary to the assertions of some climbers who oppose maintaining wilderness character, climbing in designated Wilderness areas will not come to an end without permanent fixed anchors-but defacing rock and adjacent areas will. Climbing in Wilderness existed long before modern methods of placing fixed anchors became prevalent and increased the ability of climbers to climb thus far virtually impossible "routes." Along with the increased access provided by modern technology, use has significantly increased-so has damage to the rock and adjacent areas.

Not only that, but permanent fixed anchor use and maintenance in Wilderness is-and always has been-prohibited by the Wilderness Act's ban on installations.

The agencies' primary duty is to protect Wilderness in its natural, untrammeled state, and the Wilderness Act's ban on installations can only be overcome in rare administrative circumstances where the installation is necessary to protect Wilderness in its natural, untrammeled state. Agencies have no duty to develop Wilderness to provide "opportunities for primitive recreation." Wilderness, by its very existence, provides these opportunities-the agencies need only to protect the Wilderness according to the provisions of the Wilderness Act to safeguard the opportunity.