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Comments: The USFS is proposing 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. Nonetheless, some climbing organizations champion a non-existing extant right to their installations in Wilderness, at the expense of Wilderness itself, by elevating fixed anchor climbing above existing prohibitions on activities far less permanent.

Regrettably, the USFS has listened too closely to some climbers and lobbyists for the trillion dollar a year outdoor recreation industry, and not enough to wilderness advocates. You have proposed new policies that attempt to legalize the use of fixed anchors in Wilderness areas.

The Wilderness Act keeps fixed anchors out of Wilderness.

1) The Wilderness Act prohibits installations and structures like permanent fixed climbing anchors in order to protect the areas' wild character. Fixed climbing anchors must not be allowed in Wilderness. The Wilderness Act's strict prohibitions, including its prohibition on installations, cannot be overcome by a desire to facilitate or enhance a particular form of recreation, and the narrow administrative exception for installations does not extend to the general public seeking to create developed recreational activities in Wilderness.

2) The agency's 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.

3) 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.

4) Climbing without permanent fixed anchors is generally compatible with wilderness preservation. While it may be true that fewer people will climb certain routes in Wilderness if they don't have fixed bolts or other permanently-installed protection, natural limits on use is not a bad thing when it comes to wilderness protection, particularly with the recent explosion of outdoor recreation uses in Wilderness.

For those climbers seeking developed climbing opportunities, there are ample permanently bolted climbs outside

of Wilderness.

5) Wilderness is an endangered landscape. Less than 3 percent of land in the Lower 48 is protected as Wilderness, and it is under threat, including from rapidly escalating recreation pressures.

Any specific proposals for permanent fixed anchor installations in Wilderness must be subjected to public notice and an opportunity for public comment pursuant to the National Environmental Policy Act.