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Comments: This proposal is an effort to act in direct opposition with the values of wilderness and historic preservation. It will have significant safety implications and put undue burden on controlling something that is already preservation-oriented. It is unrealistic for federal agencies to create a new policy prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

The concept of fundamentally prohibiting fixed anchors is a misapplication of preservation. I urge you to consider that fixed anchors remain "allowable with regulation". To turn your efforts to follow an evidence-based approach.

There is no longitudinal study to suggest the need for a fundamental prohibition of fixed anchors. There is no significant research to prove that fixed hardware have a significant impact on wildlife or preservation. The definition of what is "significant" can always be debated. We need an approach that values the climbing community and its adherence to land-stewardship.

Mainly, this proposal is a safety issue. It is unjust to attempt to change the use of essential safety systems such as fixed anchors. These safety systems are not prohibited "installations" under the Wilderness act. People will be forced to make safety decisions and risk their well-being to follow red tape. At minimum that is reckless. To restrict and or prohibit the placement of these safety mechanisms is asking for injuries and is potentially life-threatening. The inclusion of a Minimum Requirement Analysis (MRA) will increase safety issues as one cannot replace an unsafe anchor or hardware without approval. This needs to be managed to incentivize replacement of safety systems rather than risk the removal of climbing routes.

This proposal is a fear-based reaction to the growth of climbing. It is glossed over as "preservation", yet there is no reason to jump to such drastic solutions. Not when there are other more collaborative ways to remain well-preserved. Progressive ways that will protect the history and future of climbing and protect future public use of land. The climbing communities use of protected lands continues to fund these areas for more preservation and research. It would be wise to consider the implications of creating an unsafe climbing environment that is over-controlled and has limited access.

This proposal does not account for necessary staff hiring and funding to be allocated for maintaining and replacing fixed hardware. The specifics of getting an MRA are vague and lean toward removal over replacement. Moreover what constitutes this as a necessity moving forward?

According to National Historic Act of 1966, it is illegal to remove historic trash in protected areas. So then what is the criteria for historic climbing routes? In 1961 (over 50 years ago meets criteria) The Salathé Wall in Yosemite was established. The bolts placed would be considered historic and illegal to remove today according to the same standards. Albeit unsafe to use the same 13 bolts, the principal should remain equal.

The bolts and fixed anchors being replaced for safety should carry the same historical weight as the originals. This route itself was a landmark in climbing history. A concerted effort was also made to limit the number of bolts and to act with preservation as a priority. People should be able to continue to safely develop routes with the legacy of preservation that was spearheaded by Royal Robbins. This preservation mindset was put in place before the Wilderness Act of 1964 even existed and should be touted as ahead of its time.

Climbing is a beautiful example of living history and should be allowed to continue its journey while navigating the challenges of its growth.

Routes that have been established more recently are being done with preservation as a priority. Without growth plants die. This proposal limits the continued process of growth and exploration of new places. The adventurous and bold are the reason we appreciate these walls in a whole new capacity today. This prohibition would prevent climbers from safely exploring new terrain and being able to make decisions in the moment to place fixed hardware if necessary for their safety.

Regulations are necessary to preserve but there is a difference between preservation and prohibition. This proposal clearly leans towards prohibition and has forgotten the beauty of the climb. America's climbing legacy has brought a profound appreciation of these walls and the nature surrounding them. They've given onlookers the opportunity to truly appreciate the scale and magnificence of mountains. Climbing has enhanced wilderness areas by creating harmony between humans and nature.

People should be able to continue to responsibly use fixed anchors with regulations. Historic preservation of rock climbing and its effort towards wilderness preservation should be protected. I urge you to reconsider this strict, unnecessary and scientifically unfounded fixed anchor prohibition.