Data Submitted (UTC 11): 1/23/2024 2:03:29 PM First name: Martha Last name: Gifford Organization: Title:

Comments: I write to state my strong opposition to potential approval of installations and structures like permanent fixed climbing anchors in Wilderness areas. The Wilderness Act unequivocally prohibits this. Fixed climbing anchors and other permanent aids to rock climbing are "installations".

This prohibition on installations cannot be overcome by private goals to facilitate or enhance a particular form of recreation such as rock climbing. The narrow administrative exception for installations does not extend to the general public seeking to create developed recreational activities in Wilderness. These do not come within any plausible, narrow exception to the Act.

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 aids, a natural limit on use is not a bad thing when it comes to wilderness protection. For climbers seeking developed climbing opportunities, there are ample permanently bolted climbs outside of Wilderness.

Your agency's primary duty toward Wilderness is to preserve it in its natural, untrammeled state, according to the provisions of the Wilderness Act. The Forest Service has no duty to develop Wilderness to provide "opportunities for primitive recreation." Wilderness, by its very existence, provides these opportunities. Your agency must protect the Wilderness to safeguard the opportunity.

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. If the Forest Service does believe that the installation of fixed climbing aids is actually necessary to protect Wilderness in its natural, untrammeled state, the burden is on the agency to demonstrate this. I do not believe that the Forest Service can carry this burden.