

Data Submitted (UTC 11): 1/25/2024 5:40:23 AM

First name: Jaymes

Last name: Ullrich

Organization:

Title:

Comments: Dear National Parks Service, The Allied Climbers of San Diego and Mesa Rim Climbing Centers appreciate the opportunity to provide comments on the "Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness". Allied Climbers of San Diego is a local climbing organization (LCO) that works closely with the Access Fund to advocate for environmentally responsible recreation of climbing activities in San Diego, California and surrounding areas. Mesa Rim Climbing Centers is one of the largest climbing gym organizations in the US and reaches over 100,000 people nationwide in Nevada, Texas, and California. As climbers, we place a high value on preserving the environment for future generations and protecting wildlife, natural, and cultural resources. Climbing is an activity that relies highly on self-reliance, and allows people to experience wilderness in a way that you cannot by walking on a trail. Climbing aligns with the goals of the wilderness act of 1964 as it does allow for "solitude or a primitive and unconfined type of recreation". We would like to share why having fixed gear is not incompatible with wilderness areas, and how prohibiting the installation and replacement of fixed gear can actually lead to more degradation of fragile environments. Having safe, well maintained, and strategically placed fixed gear actually reduces impact. This is analogous to having designated trails, which are used in wilderness areas to reduce impact. Having fewer, well marked, designated trails prevents others from making many social trails that would degrade a habitat. Bolts and fixed rappel stations prevent resource degradation in fragile alpine environments. Prohibiting fixed anchors encourages climbers to rappel off of trees and bushes, which can eventually kill cliffside vegetation. Bolted anchors reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location to rappel, rather than a convoluted descent. Rappelling is the primary cause of death in climbing accidents. When climbers rappel, they rely on an anchor, and anchor failure during rappelling often results in death. Prohibiting the maintenance of anchors or placing bolted anchors increases the risk of anchor failure. This would increase demand on already overworked volunteer Search and Rescue (SAR) organizations and greatly increase the risk of severe or fatal climbing accidents. Restricting the replacement of existing bolts, or the addition of new bolts, would create even more demand on SAR.