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First name: Brooke

Last name: Dickie

Organization:

Title:

Comments: To whom it may concern,

As an avid climber and outdoor recreationalist, I am writing to voice my general opposition to the draft guidance that may lead to prohibition on fixed anchor installments in Wilderness areas. While I wholeheartedly support the notion that wilderness areas should be protected from long-term nefarious human impacts, I do not believe that anchor prohibition is the correct approach.

Climbing has a long history in the US and has grown in popularity. Anecdotally, when comparing climbers to other recreationalists that frequent wilderness areas (hikers, bikers, boaters, hunters, etc.), climbers maintain an incredibly high standard for self-sufficiency and leave no trace ethics in the outdoors. Of all US SAR operations, technical climbing rescue makes up <5% of annual incidents (Citation: <https://academic.oup.com/jtm/article/16/1/23/1803249>). Communities of climbers are often some of the strongest advocates of minimizing impact and preserving public lands for both recreation and conservation alike. Due to the strong environmental ethic that is garnered through long days in the mountains, it is my personal belief that public sentiment towards land conservation stands to benefit greatly through the continue proliferation of climbing popularity.

First, prohibition of bolted anchors will have a severely negative impact on the accessibility of climbing within Wilderness areas. Fixed anchors are an essential piece of climbers' safety system and should not be considered prohibited "installments" under the Wilderness Act. Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken voluntarily by the climbing community. We as climbers would like to continue to engage with the sport in the most ethical and safe way possible. We seriously rely on fixed anchors as a tool to remain safe and self-rescue as needed. Help us maintain our proud tradition of minimize strain on government-provided resources (such as SAR) but allowing us to maintain safe in-place anchors.

Rather than prohibiting all in-place / fixed gear (anchors, bolts, rappel stations, etc.) as "installments," the Wilderness Act could consider providing guidance on using material that matches the surrounding environment, such as the regulations that have already proven effective in areas like Arches NP (Citation: <https://www.nps.gov/arch/planyourvisit/rockclimbing.htm>). There could also be regulations on using bolts instead of soft material whenever possible for fixed anchors, as bolts are both safer (Citation: <https://publications.americanalpineclub.org/articles/13201200200/Know-the-Ropes-Rappelling>), degrade much more slowly, and do not leak microplastics into the environment (as is the case with synthetic soft materials, such as nylon).

Please consider make the language of the Wilderness Act much clearer to codify climbing access throughout the wilderness areas of the US. Increased regulation on in-place climbing gear is a welcome change, but an all-out ban will have deeply negative effects on climbers and outdoor services alike. Please consider these modifications, and thank you for helping our community continue to engage ethically with the places we love!