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Comments: I am writing to oppose and propose modifications to the proposed fixed anchor in wilderness regulations.

Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. I have often used fixed anchors to safely descend climbing routes. Most fixed anchors I have used are very hard to find, i.e., basically invisible and preserve resources like trees and vegetation (which will be damaged by rope if fixed anchors are removed). The approved trails, bridges and excessive signage are much more visible and impactful than any fixed anchors used by climbers.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes. Lastly, search and rescue (SAR) groups need anchors to safely rescue citizens.

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Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

Climbing management policy needs to protect existing routes from removal. Climbers and land use managers should work together on a area-by-area basis, this one-size-fits-all proposal seems unnecessary and unwise.