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First name: Emily

Last name: Gross

Organization:

Title:

Comments: To Whom it May Concern,

As both a biologist, social scientist, and rock climber, I wholeheartedly disagree with prohibiting fixed anchors in wilderness areas. Rock climbers have a rich history of conservation action, and prohibiting safe climbing in natural spaces will only harm relationships with the climbing community. Instead of fighting against "impact" (which is minimal in the case of fixed gear), I encourage you to seek collaboration with the climbing community to elevate conservation efforts. Consider the fact that climbers have access to areas that biologists don't and that perhaps collaborative cliff monitoring of rare and endangered species should be pursued instead. These opportunities for novel research and collaboration will be greatly diminished, if not halted, due to safety issues if future fixed gear is limited to the extent that is suggested.

Historically, many forms of governance have shaped climbing best practices- keeping both climbing safety and environmental protection in mind. The Forest Service does not have the funding, nor capacity, to manage climbing to the extent proposed on Forest Service lands.

Please consider these additional points from the Access Fund and protect America's climbing by protecting sustainable wilderness climbing access:

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.

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.

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.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

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.

The idea of the American wilderness not involving low-impact usage is both outdated and rooted in colonialism. Humans have, and will continue to, shape our landscapes regardless of wilderness status. The decisions you make now will help shape the safety, ecological progress, and environmental values of rock climbers on Forest Service land.

Thank you for your consideration,

Emily

