Data Submitted (UTC 11): 1/29/2024 12:11:23 PM First name: Joshua Last name: Mabie Organization: Title: Comments: Hello:

I write to express my concern about the proposed regulation change that would reclassify climbing anchors as installations and prohibit them in wilderness areas.

I have long been a lover of the National Parks and National Forests. The wilderness areas on public lands are places I cherish. For more than 30 years, I have visited, loved, and climbed in the Wind River Range, Joshua Tree National Park, and Daniel Boone National Forest. I have taken my young children to all of these places, and I am grateful for the management plans and dedicated park and forest service employees who work to assure that my children will one day be able to take their grandchildren to these beloved places and see them as essentially unchanged.

It is out of my love for wilderness areas on public lands that I write to express my opposition to reclassifying fixed anchors (climbing bolts) as "installations" that would be prohibited under the Wilderness Act. Climbing in the wilderness has a long history that predates these lands' designation as wilderness and the idea of wilderness encompasses climbing as a compatible activity. Wallace Stegner begins his famous wilderness letter by acknowledging that climbing will of course be one of the approved recreational uses of wilderness even as he argues for a non-utilitarian and non-recreational conception of wilderness: "Hunting, fishing, hiking, mountain-climbing, camping, photography, and the enjoyment of natural scenery will all, surely, figure in your report," wrote Stegner to the Outdoor Recreation Resources Review Commission in 1960.

Pehaps Stegner's recognition of the compatibility of climbing and wilderness preservation had something to do with his friendship and support for David Brower, the then-president of the Sierra Club and an American who did as much as any other to preserve American wilderness. Brower was of course also a climber who completed many first ascents that required rappelling off high places with fixed anchors.

While it is true that a climbing bolt is a mark (like a hoof print or a bridge or trail stabilization) left by a person on a rock in a wilderness area, land managers across the nation have long recognized that fixed anchors actually preserve the environment and wilderness experience by creating a safe site of descent that does not damage trees and that does not leave behind unsightly webbing or cord. Fixed anchors make leave no trace climbing possible.

Climbing has been an approved recreational use wilderness since its inception and fixed anchors are an essential part of this approved. Instead of making a radical change to climbing management on public lands, I ask that you preserve the status quo with regard to climbing anchors that has existed since the inception of wilderness designation on public lands.

Sincerely,

Joshua Mabie Climber and Wilderness Lover and Associate Professor of English and Environmental Studies University of Wisconsin - Whitewater