

Data Submitted (UTC 11): 1/29/2024 1:29:05 PM

First name: Simon

Last name: Carr

Organization:

Title:

Comments: Comments on Proposed NPS Guidance Regarding Fixed Anchors & Fixed Equipment in Wilderness

I am writing to express my concern over the proposed NPS guidance regarding fixed anchors in wilderness areas. The proposed, unnecessary, interpretation of fixed anchors as 'installations' could make much of the established and potential climbing that exists in wilderness areas effectively impractical and dangerous. Such an outcome would be at odds with the current interpretation of the Wilderness Act, which recognizes and encourages climbing as a permitted activity, which historically in many areas - for example Yosemite - predates the passing of the Wilderness Act.

Over the last 30 years I have personally climbed in many of the areas that would be affected by the proposed changes in guidance; including but not limited to Yosemite, the Sierras, Joshua Tree, Rocky Mountain National Park, Granite Mountain, the Wind Rivers, Old Rag and the Linville Gorge. My experience of adventure climbing and wilderness has been assisted and enhanced by occasional fixed anchors, often in the context of permitting safe descents.

The existing guidance - Director's Order 41 - has been very successful in allowing climbing to flourish in Wilderness areas. That order allows the limited use of fixed anchors for ascent and descent, and the climbing population has respected this. There has been no proliferation of bolted sport routes in Wilderness areas, and the bolts that have been placed have usually been hand drilled. The climbing community believes that the existing policy has been very successful in allowing exploratory climbing as well as the repeats of established routes, while preserving the wilderness status of these areas.

Observations from a climber's perspective:

\*Fixed anchors are not prohibited "installations" under the Wilderness Act and there is no need to class these as such;

\*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 many years;

\*Fixed anchors are an essential piece of climbers' safety system and prohibiting fixed anchors will create safety issues, and hinder the regular maintenance of existing anchors;

\*Retaining existing climbing policies allowing the limited use of fixed anchors will preserve Wilderness character while providing for primitive and unconfined climbing;

\*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;

\*If the draft directives are adopted, it is also likely that prohibitions on fixed anchors will be extended to non-wilderness areas through Climbing Management Plans, for reasons of bureaucratic standardization to ease the effort of administration. There is no need to apply policies - whether existing or proposed - that have been developed for Wilderness areas to non-wilderness areas.

In summary, the proposed changes to guidance concerning fixed anchors in wilderness are unnecessary and should be reconsidered. The existing policies under Director's Order 41 are perfectly adequate and allow the NPS to balance the provision and encouragement of recreation activities such as climbing with the preservation of the special nature of Wilderness areas.

Thank you for the opportunity to comment.

