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Comments: I am writing to voice my opinion on the proposed plan for regulation of fixed anchors. First, I want to start by considering the spirit of the wilderness act. Based on my reading of the act, the quote defining a wilderness area as an area "which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value." lays out what the wilderness act believes to be key for an area to be designated as wilderness. The wilderness act itself is striving to protect these areas for us and future generations to enjoy as wilderness. In the remainder of my comment, I will address why I believe that fixed anchors are not in opposition to wilderness areas and why I believe they should be allowed (in a semi-regulated) way and a proposal for what I would like to see as a climbing management plan.

The main point I'd like to make is that fixed anchors cause very little impact to other wilderness users or even to the rock itself. I would argue that the vast majority of fixed anchors are not easily viewable, let alone noticeable, to the majority of people in the wilderness who are non climbers. Fixed anchors tend to be hard to see due to camouflaging techniques and just the fact that bolts are small and located in places where people tend to not look, even when they are close to the ground. In addition, many fixed anchors in wilderness are hundreds of feet off the ground and not visible by the naked eye. Regarding the effect made on the wilderness area, trails and social trails of which there are many in wilderness, displace much more rock and soil than fixed anchors.

All that being said I, along with the vast majority of climbers, do not want to see wilderness areas littered with unnecessary bolts. When removable protection is available, bolts should not be placed in wilderness areas. I believe this is a philosophy that the climbing community enforces in all areas, not just wilderness areas. There are crags around me on public land (non wilderness) that have no fixed anchors despite the fact that fixed anchors would make it much easier and convenient.

The next point I would like to make is that sport climbing could have a place in wilderness in specific situations. Certain rock types do not allow for the placement of removable protection and require fixed anchors, typically bolts. When considering sport climbing, I think it is critical again to consider the spirit of the wilderness act. I believe that even sport crags leave "the imprint of man's work substantially unnoticeable". By enforcing that hand drills are used, and assuming no roads due to being in a wilderness areas, establishing a single sport climb is a huge undertaking. There is a crag near where I live that is slightly over a mile from the road where climbing began about 20 years ago. Even with the use of mechanical drills and the relatively close hike to get there, there are still vast amount of untouched, unclimbed rock in the area. And even though the climbing is some of the best in the area, you rarely see many other climbers there due to the somewhat involved approach. My point here is that the current regulations in place in wilderness areas provide checks that make it difficult for overly bolted, overly crowded sport crags to develop. I would go so far as to say that requiring length tedious MRAs would go so far as to confine recreation in these wilderness areas.

That being said, I do believe that there should be some oversight to placing fixed anchors in wilderness. I believe that the money spent deciding whether to approve or decline an MRA could be better served at an individual area level working towards a climbing management plan for that area. Some areas will need more oversight. Certain areas in wilderness have been climbed at for decades, many times before that wilderness area was even established. Shouldn't the previously installed fixed anchors have prohibited those areas from being designated wilderness? Has something changed that requires modification in how fixed anchors are treated?

I want to make a final point about safety. While this has undoubtedly been brought up a number of times, the placing of fixed anchors is required to some degree for safety. Old bolts that need replacing but can't be replaced can, and most likely will, lead to countless accidents and injuries, or worse, while waiting for MRA approval. Furthermore, when establishing new routes climbers do not know ahead of time how many fixed anchors they will need. How would this work under the proposed guidelines?

For a specific plan, I would like to see climbing guidance that states that fixed anchors should generally be allowed except in special circumstances, rather than the other way around. If a wilderness area is having problems with too many fixed anchors for legitimate reasons that harm wilderness character, I believe that those areas should first work with climbers on the issue. Any decent local climbing organization will certainly agree that an overabundance of fixed anchors in wilderness areas is a problem and would be happy to work with the wilderness area to fix the issue. In some wilderness areas, I would be in favor of designating some cliffs for climbing and designating some cliffs as off limits. We don't need 10,000 routes in wilderness areas but discrete well placed fixed anchors will provide many climbers access to enjoy wilderness areas in ways they would otherwise not be able to.

In conclusion, I believe that the proposed guidance is not accordance with the spirit of the wilderness act. Based on my reading, the wilderness act was meant to keep clear human impact out of wilderness. Things like cars, roads, industry, etc. are a huge detraction to the enjoyment of wilderness. The impact of fixed anchors are not even close to that level of impact and, in fact, they provide the ability for many to enjoy wilderness areas. I would argue that over the last 60+ years climbing has made very little impact on wilderness areas and that the proposed regulation is trying to fix a problem that doesn't exist. I would much rather see fixed anchor decisions made at a cliff level, rather than at the individual fixed anchor level. Would designating a cliff rarely seen by hikers and others for sport climbing impact the wilderness area more than the trail required to get there? Does allowing fixed anchors on El Capitan in Yosemite leave it in an impaired condition or leave a substantially noticeable impact? I'd argue no and I would like to see the proposal reflect this.

Finally, I would like to end with part of the reason I feel so strongly about this. I grew up in the heart of Los Angeles and spent very little time in truly remote areas. Wilderness and preservation of the natural environment was not something I really even considered. However, I was lucky enough to fall in love with the wonderful wilderness areas we have in the United State through climbing in places like Joshua Tree and Yosemite, as well as others. Most of these experiences required a few fixed anchors. Based on my understanding of the proposal, if this was enacted earlier I would likely have not had many of those experiences due to the MRA process, or worse, I have have gotten injured due to a bad bolt when I was less experienced. In short, fixed anchors enable many people to experience wilderness areas, sometimes for the first time, and have quite a small impact. As a result, fixed anchors should generally be allowed and are in the spirit of the wilderness act.

Thank you for reading my comments. I really appreciate taking the time to understand all sides of the debate here. And while I do see that it is a nuanced issue, especially in the case of sport climbing, climbers have quite a small impact in wilderness areas and I believe that the rare infringement can be handled on a case by case basis by the people in charge of the specific wilderness area.