

Data Submitted (UTC 11): 1/29/2024 9:32:48 PM

First name: Donette

Last name: Swain

Organization:

Title:

Comments: I have been a frequent user of federally designated wilderness for climbing and hiking since 1977. I have climbed in wilderness throughout the western states and Alaska.

I urge the NPS and USFS to abandon this injudicious attempt to re-interpret the Wilderness Act and invalidate critical portions of current policy: the 2007 Bureau of Land Management memorandum and the National Park Service Director's Order 41.

These proposed regulations that reimagine fixed anchors as installations seem to be an attempted end run around clarifying legislation currently working its way through Congress. The PARK Act creates a rare opportunity for bipartisan legislation that comprehensively addresses the needs of users and managers. The PARK Act is tailored to support careful management and use of wilderness.

Fixed anchors are an integral part of climbing and can be found in many wilderness areas. In many instances, fixed anchors predate wilderness designations.

Wilderness areas like El Capitan in Yosemite National Park, the Wonderland of Rocks in Joshua Tree National Park, the Diamond in Rocky Mountain National Park in Colorado and the White Mountain National Forest in New Hampshire all had fixed anchors before they were designated wilderness. Never in the intervening decades did Congress tell land managers that fixed anchors on El Capitan or the Diamond were installations and thus prohibited by the Wilderness Act.

Never during Congressionally mandated studies to determine if proposed wilderness areas had appropriate characteristics to become designated wilderness has a land manager suggested an area did not meet wilderness criteria because there were fixed anchors. To the contrary, agency policies such as the 2007 Bureau of Land Management memorandum and the National Park Service Director's Order 41 acknowledged that fixed anchors are allowed in wilderness.

Changing the interpretation of "installations" within the Wilderness Act concerning fixed anchors will create a myriad of headaches for federal land managers. All federal land management agencies are currently underfunded and any realistic person knows that is not going to improve. The proposed fixed anchor policies by the NPS and USFS would create incredible amounts of extra work to try and figure out what happens to fixed anchors.

For many decades climbers from around the world have relied on fixed anchors on cliffs like El Capitan and the Diamond. How will these historic climbs remain safe and climbable without fixed anchors?

Benign neglect is recognized management tool, but inappropriate for fixed anchors.