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Comments: I am writing to offer my comments on the draft policies that would make fixed anchors prohibited in America's Wilderness areas.

I was introduced to climbing in 1971, and I have participated in its growth and popularity over the years. The sudden surge in rock climbers led to land management conflicts, and it was clear to some of us that working together as climbers and land managers was the only sustainable solution to resolving the various issues. I was Chair of the Potomac Appalachian Trail Club's Mountaineering Section, Chair of the American Alpine Club's Blue Ridge Section, a member of the American Alpine Club's Access Committee, and one of the founding members of Access Fund. In all of those roles I participated in dialog and interactions with various land managers - NPS, NFS, BLM in the Federal arena, States, and private land-owners. I also worked in the Federal Government and so understood not only the necessity but also the process of introducing and passing legislation, the subsequent codification of laws and then the OMB-led rule-making processes that created a framework for carrying out the intentions of Congressional action.

The proposed policy redefines the numerable existing fixed anchors in Wilderness areas as "prohibited installations." This definition would create significant negative consequences on what has been a commonly acknowledged and accepted practice. Fixed anchors have been in use for decades, and it is unclear why there is a need to immediately ban their use.

The proliferation of fixed anchors was exacerbated in the United States by the "sport climbing" surge in the 1980's, but many fixed anchors had been placed prior to that - some in Wilderness areas, many not. Their use led to creation of some of the most notable climbing routes in the world. And there was push-back on their use, even within the climbing community (one recalls Royal Robbins chopping Warren Harding's bolts on the Dawn Wall on Yosemite's El Capitan, and stopping after realizing what an incredible route the Dawn Wall was).

But what purpose do fixed anchors serve to the climbing community? In aid climbing, a fixed anchor is used directly to advance up a route. But many other fixed anchors are used to provide intermittent safety points when free climbing, and perhaps more importantly provide safe anchors from which to rappel and regain the base of a route. Some elements of climbing risk are minimized through the appropriate use of fixed anchors. Without them, climbers would have to engage in life-threatening exposure to falls on many existing routes, and it would be impossible to safely descend as well.

There are other, less draconic, solutions to managing fixed anchors. Fixed anchor management models are in place throughout the Country. These models establish transparent review and approval guidelines and processes for installing, maintaining, and removing fixed anchors. These models require land managers and climbers to work together to carry out these management practices, which creates a measure of cooperation and trust between the interested parties.

I urge that the present proposed draft policies be withdrawn, and that a cooperative approach is taken with the climbing community to address fixed anchor usage and management within Wilderness areas. A collaborative management policy will be successful, whereas one adopted without the climbing community's input will not.