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First name: brent

Last name: manning

Organization:

Title:

Comments: I am a 74 year old climber, taxpayer, wilderness and environmental advocate. I have worked both as a citizen and as a lawyer to promote and protect wilderness and national monuments in Utah. I strongly oppose the effort of the federal government to take the unprecedented and unjustified position that fixed anchors are installations and thus prohibited in wilderness area. Technical climbing has always relied on fixed anchors, whether, a sling around a tree or rock, or the safer and less obtrusive fixed bolt or pin. Most technical routes do not have a safe walkoff so that a fixed anchor is necessary for the descent. Since one of the primary motivations for the creation of national parks, monuments and wilderness was the preservation of wild places for traditional uses and climbing was among the uses that advocates sought to protect and promote it is directly contradictory and wrong now to prohibit climbing by prohibiting the safest means by which climbers can enjoy the wilderness and parks they supported and helped create. I for one never thought that my extensive efforts on behalf of SUWA and other efforts to support wilderness and national monuments would now mean that I cannot enjoy these area in the way that is most important to me--climbing and being in these beautiful natural areas.

There is a long history of climbing and fixed anchors in wilderness areas. Many of our most iconic climbing areas have and had fixed anchors before they were designated as wilderness or national parks or monuments, i.e. Yosemite, Joshua Tree, Black Canyon of the Gunnison, Sawtooths, Indian Creek and the list goes on. Climbing is an important part of the visitor experience, whether as an observer or as a participant. I often see visitors watching and interacting with climbers and it is an important part of their experience and use of our public lands. I have climbed on every continent, in most western states and in many of the iconic areas in the east. The thing that sets the American west apart is the extent of public lands and the ability of people to enjoy it, including climbing. If you prohibit fixed anchors you will be destroying the possibility of safe climbing in many of the most important climbing areas.

How do you propose to deal with all of the fixed anchors now in wilderness, remove them at enormous expense and some destruction, let them become unsafe and let people be injured or killed and hope that the government will be liable so that the families deprived of their loved ones can survive? Fixed anchors must be maintained to be safe and must be allowed .

I am not advocating the indiscriminate use of fixed anchors, such as bolting trad routes that can be climbed safely without fixed anchors except perhaps for descent. But there is a big difference between the existing structure that allows reasonable regulation and the prohibition by classifying fixed anchors as installations which is contrary to the position that applicable agencies have long taken and upon which climbers and wilderness advocates have relied..