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Comments: I am writing to comment on the draft policy that would make fixed rock-climbing anchors prohibited in wilderness areas. I have been climbing all over the country for the past 25 years, frequenting wilderness areas and I do not see a reason to change the current management practices. Climbers have long been intense stewards of the wilderness. My own wilderness experiences growing up in Washington state inspired what has become a lifelong dedication to outdoor education, environmentalism, improving equity of access to the outdoors, and a general life ethos of treading lightly on the land. I have never found that fixed anchors diminished my wilderness experiences and had never considered them to be out of character for a wilderness area. In the few first ascents I've contributed, land managers have restricted to hand drilling bolts, which I am usually doing on lead from stances. That takes a LOT of effort and a lot of care - adding a fixed anchor is never a willy nilly decision, and the gargantuan effort to put one in makes us always hope that we don't have to, but sometimes you're exploring and there are no other options. I'm in the wilderness, I can't call up the land manager and wait for a government speed approval while I'm mid-route.

What stakeholders will benefit from this ban? I do not see a benefit to current or future land users or stakeholder groups. The only people out on the cliffs are rock climbers, and they have long been a fixture of national parks and wilderness areas. Many tourists come to Yosemite to peer up at the athletes inching up El Capitan. It's a part of the history, culture, and ethos of many of our wild places. Within these wild places, fixed anchors have been allowed, managed, and authorized for decades. We work around nesting birds, leaving them space when needed. We organize stewardship events to clean up popular wilderness trailheads and high use areas. Young climbers are a growing population of future stewards of our public lands, but poorly constructed policies like this draft policy pit climbers against land managers, when they could be powerful allies in maintaining wild land designations for posterity. I am also concerned about protecting the legacy of climbing in these places. Such a broad sweeping ban, as proposed by this draft policy, fails to consider existing routes. A bolt ban threatens the legacy of climbing itself in these areas. Many a trade route does not have anchor options beyond the existing bolts. Removing the fixed anchors entirely would remove the route and its history. Keeping the fixed anchors, but prohibiting their replacement creates a safety issue as they age. Effective land management policy needs to account for fixed anchor maintenance in a way that incentivizes safe anchor replacement and does not risk the removal of established climbing routes.

I fail to see why fixed anchors are seen as an issue. They are not "installations", but rather, essential parts of an explorer's safety system, and judicious use of them protects access to safe climbing opportunities and appropriate exploration of wilderness areas. Part of the character of wilderness is not knowing what you will encounter when you quest out into the unknown, and blanket bans on fixed anchors prohibits climbing explorers from making appropriate in-the-moment decisions about how to best protect a route and inhibits unconfined wilderness climbing. For the time being, I recommend you keep this policy in draft form, and deeply consider all of the feedback received from stakeholders before enacting what would be a devastating blow to a key land use group.

In terms of the restriction of establishment of new routes to "existing climbing opportunities" on non-wilderness lands, I don't even understand what this means. It seems unenforceable and does nothing more than sow confusion. Non-wilderness climbing policy should maintain opportunities for new anchors unless analyses determine climbing should be restricted to protect cultural and natural resources.

Thank you for your consideration,
Alaina