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Comments: Greetings.

I am writing to express my deep concerns about the proposed fixed anchor guidelines in NPS wilderness and to offer some suggested improvements to the guidelines.

A bit about me for context: Rock climbing has been a central part of my life for over 20 years. I have been a professional climbing guide (and AMGA Certified Rock Guide) based in Moab, UT, and operated my own guide service for many years, facilitating trips for thousands of clients and generating millions of dollars for my local community. Cumulatively, I have spent years of my life climbing in designated wilderness areas throughout the US. I am an active first ascensionist and bolt replacer.

I see wide-open public spaces as America's greatest resource, and designated wilderness areas (especially those in our incredible national parks) provide some of the most valuable and unique "opportunities for unconfined recreation" on the planet. In a world full of "areas where man and his own works dominate the landscape," it is critical to preserve "untrammled" areas both for their own sake and as a refuge from the otherwise disconnected, overstimulating, and unnatural places where most people spend most of their time.

My primary concerns about the proposed guidelines are as follows:

(1) I can see how a restricted reading of the Wilderness Act could lead one to include fixed anchors as "installations," but it was clearly not the original intent of the act or its proponents to include them as such. In addition, almost 60 years of precedent and current Congressional bills (i.e., the PARC/EXPLORE and America's Outdoor Recreation Acts, which I support) disagree with defining fixed anchors as installations. I believe that climbing and fixed anchors should be federally managed in wilderness areas, but defining fixed anchors as installations is too blunt of a tool to do so.

(2) Part of the problem with defining fixed anchors as installations is that this definition forces the alarming switch from new and replacement fixed anchors being "innocent until proven guilty" (under the current paradigm) to "guilty until proven innocent" (under the proposed guidelines). This is antithetical to the American way of doing business and seems to ignore the fact that climbers have generally placed and replaced fixed anchors in wilderness in a thoughtful, responsible manner that is consistent with the ethos of designated wilderness.

(3) Defining fixed anchors as installations also places an undue burden on both climbers and land managers to determine when fixed anchors meet the highly subjective "minimum necessary" criterion "to facilitate primitive or unconfined recreation or otherwise preserve wilderness character" through the Minimum Requirements Analysis (MRA) process. MRAs are typically used by bureaucratic agencies, not individual private citizens, to grant exceptions to certain rules/regulations in wilderness areas. Requiring MRAs for new and replacement fixed anchors is overly restrictive and cumbersome for those adding or replacing fixed anchors as well as for the land managers reviewing them.

(4) With respect to the burden on land managers dealing with MRAs, despite their best intentions, the unfortunate reality is that many federal agencies are underfunded and understaffed. It's not clear that they will have the capacity to properly research individual routes/areas, make nuanced and informed decisions regarding fixed anchors, or enforce the proposed regulations. It seems likely that this lack of resources among land management agencies and the default of "guilty until proven innocent" will lead to unnecessary and unintended closures, the inability to replace aging fixed anchors, and inappropriate limits on new routes/fixed anchors.

(5) The proposed guidelines would present serious safety hazards to climbers ascending and descending established routes. Climbers need to be able to replace existing fixed anchors on the fly without concern for litigation/penalty. It is not always (or often) possible to know in advance that an existing fixed anchor needs to be replaced, particularly in remote wilderness areas. In this regard, the proposed regulations are particularly

concerning with respect to the simple, unobtrusive act of replacing easily removable/replaceable fixed anchors such as slings, which I think it would be reasonable to treat differently than bolts (which generally require more planning and specialized expertise to replace).

(6) The proposed guidelines also seem unrealistic in the context of first ascents and the related establishment of new fixed anchors. It's often impossible to know exactly what will be required on a route before actually climbing it. The proposed guidelines would remove a critical element of the challenge and self-reliance of remote first ascents, which are exactly the type of activity the Wilderness Act was designed to preserve.

(7) Allowing appropriately restricted forms of climbing in designated wilderness areas has historically been justified on the basis of the activity's ability to "connect people with the land, build self-reliance, present challenge, and require skill. These experiential values can provide opportunities for primitive and unconfined recreation and therefore be necessary to the administration of a wilderness area." The proposed guidelines threaten wilderness climbing in a way that could, either intentionally or unintentionally, undermine the very purpose of wilderness. I have personally experienced all of these benefits from climbing in wilderness areas and can attest to the fact that such benefits are simply not available in the same way through non-wilderness climbing.

While I recognize that the proposed guidelines relate specifically to NPS wilderness areas, I'm concerned that, if passed, these guidelines might spill over to recommended wilderness areas, wilderness study areas, and potentially other non-wilderness federally managed lands. I hope that the NPS recognizes its influence and acts in a manner that preserves climbing opportunities throughout the country.

I agree with the Access Fund that the proposed guidelines "would create significant safety issues, threaten world-class climbing routes, obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape." Please consider working with the Access Fund, American Alpine Club, and American Mountain Guides Association to draft new guidelines to manage climbing in wilderness. Thank you for providing the opportunity to comment and for protecting and caring for our public lands.