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Comments: Hello,

I am writing to express my concern about the direction of this proposed ruling. We all recognize the unassailable critical nature of wilderness. While the government recognizes climbing as a legitimate use of wilderness, I believe this ruling does not align with that recognition and is contrary to 50+ years of precedent. Fixed anchors have long been understood to be a fundamental element of climbing in many situations.

This ruling treats all fixed climbing anchors illegal until proven otherwise, including long established routes. The process to get a fixed anchor, often a necessary critical safety feature, is complicated and likely to be a drawn out process, at the mercy of interest of the land manager and available resources. The burden of proof is on the climbing community to establish why a fixed anchor is necessary, essentially asking them to prove every time again why their land use is legitimate, which has already been recognized by the government. Realistically, this may not even be possible to prove until a route is established and understood. The lack of fixed anchors is also likely to place additional stress on natural features, such as trees and rock, that has the potential to cause far more disruption to the natural environment than fixed anchors. It also seems unrealistic to expect land managers to evaluate the tens of thousands of existing historical routes against these same criteria, or expect them to remove bolts, without providing additional resources to do.

In my opinion, a more measured approach, that recognizes the importance of wilderness and allows the opportunity to limit the over proliferation of fixed anchors, is to implement a similar permitting system for new installations, but to assume a small number of fixed protection points is allowable unless unnecessary or there are extenuating circumstances, such as an over density of routes, cultural heritage features, etc. This approach would be more consistent with 50 years of precedent, as well as eliminating the uncertainty and associated safety risks associated with replacing fixed gear on heritage routes.

Regards