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First name: David Last name: Loh Organization:

Title:

Comments: To Whom It May Concern,

As an avid alpine rock climber for the past 35+ years, I am writing to voice my opposition to the National Park Service's (NPS) and U.S. Forest Service's (USFS) draft policies of prohibiting fixed anchors in wilderness areas. This new policy will dramatically impact climber's ability to safely navigate in wilderness areas and effectively eliminate climbing as an outdoor pursuit on lands under the NPS's and USFS's jurisdiction.

I am currently a retired Information Technology Consultant who previously was a partner/part-owner in a 120-person software consulting firm. I was first introduced to climbing as a university undergraduate student and it subsequently became my primary recreational activity for the duration of my adult life. The following is a summary of climbing days that I have spent on lands under the NPS's and USFS's jurisdiction:

- \*Angeles National Forest: 100+ days
- \*Eastern Sierra / Inyo National Forest: 50-100 days
- \*Tahquitz / San Bernardino National Forest: 50-75 days
- \*Cochise Stronghold / Coronado National Forest: 10-15 days
- \*Uinta-Wasatch-Cache National Forest: 10-15 days
- \*Granite Mountain / Prescott National Forest: 10 days
- \*Wind Rivers / Bridger-Teton National Forest: 10 days
- \*Mt. Baker Snoqualmie National Forest: 7 days
- \*Mt. Shasta Trinity National Forest: 5 days
- \*Mt. Hood National Forest: 3 days
- \*Joshua Tree National Park: multiple hundreds of days
- \*Yosemite National Park: over 100 days
  \*Grand Teton National Park: 16 days
- \*Mount Ranier National Park: 5 days

\*Acadia National Park: 1 day

While I am fully appreciative of the difficulties in defining policies that are acceptable to various (and often competing) constituent groups, the proposed prohibition of fixed anchors would put the climbing community in an untenable position, namely:

- \*Fixed anchors are an essential component to climber safety. The elimination of fixed anchors would effectively eliminate climbing as an outdoor activity
- \*Fixed anchors have been allowed on federal lands for decades with minimal negative impacts to other user communities
- \*The proposed Minimum Requirements Analysis (MRA) process for granting fixed anchor exceptions is an unworkable solution for many/most climbing situations. In many alpine/backcountry/wilderness climbs, in situ and/or impromptu fixed anchors are required to safely rappel/retreat/egress off of a climbing route

The Access Fund and American Alpine Club are climber advocacy groups that have both been actively involved in these discussions and I fully support their policy positions on this matter. Specifically, I support:

- \*The banning of mechanized equipment (i.e. power drills) to install new fixed anchors
- \*A more measured and flexible permitting process for installing new permanent fixed anchors

Thank you for your kind consideration in this matter.