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Comments: As an American, I am most proud of the diverse natural areas that our country exists upon. For me, the designation of wilderness areas to further protect and acknowledge this natural wonder has proven one of the more successful pieces of legislation of the 20th century. One of the main activities I participate in while I am in wilderness areas is rock climbing. I believe that rock climbing responsibly in wilderness areas is a great way to experience firsthand the natural beauty of our country.

As more people have begun spending time exploring and enjoying our wilderness areas, I acknowledge that more legislation and limitation may be needed to maintain these spaces. I understand that one of these user groups are climbers and that their numbers in wilderness may need to be limited as use increases. I am glad that current directives and order do not support the creation of sport climbs (climbs protected primarily by bolts) in the wilderness.

I am commenting because although I am in support of limiting use of climbing in wilderness areas if it is threatening values, I do not agree that targeting fixed anchors is a way to meet this goal. My primary concern is that clean trad (the placement of removable gear) needs fixed anchors to be performed safely. My secondary concern is that these proposed directives would retroactively threaten fixed anchors on iconic routes that showcase the wonders of our wilderness areas to the world.

Unless a climb has a clear walk-off, fixed anchors are the only way for climbers to safely rappel or retreat from a climb without leaving gear. A climb established ground-up using clean climbing techniques needs to fix an anchor of some sort in order to descend after finishing their climb. If fixed anchors were not established climbers would have to leave their own gear in order to repel off most climbs (exception being a climb with a safe walk-off descent). I think it is clear that two hand drilled bolts or a few nylon slings every couple hundred feet is considered more desirable than a random assortment of left gear that would result if no fixed anchors existed. A climb with fixed anchors has similar level of impact that a trail has, even less so because much less native vegetation is needed to be cleared to establish these routes. I would argue that the most impactful part of a rock climb is not the fixed gear but instead the presence of humans on the climb. If we are in agreement that climbing should be allowed in wilderness areas then fixed anchors should be allowed on said climbs as safe clean climbing is not possible without them.

I disagree that fixed anchors that are already in place in the wilderness should be deemed illegal until validated by the proposed system. World famous climbing areas such as Yosemite and Zion fall into wilderness areas. I am concerned that these directives could lead future land managers to attempt to remove fixed anchors in iconic locations such as these. Photographs of climbers on these features capture the American spirit of adventure and creativity and display it proudly to the rest of the world. Climbers will always be eager to test their skills on these historic routes. I also think that retroactively making these fixed anchors illegal could cause these anchors to fall into disrepair, leading to potential future injury.

To reiterate I believe there should be restrictions on climbing if the amount of climbers in an area is threatening said areas wilderness designation. I am also in full support of any restrictions on areas where climbing would impact critical habitat of native plants and animals. I would argue that current fixed anchor use is only in place for the safety of the climbers and that attempting to regulate in this manner would only impact the safety of climbers, not improve the quality of wilderness areas.

Thank you for your time,

Sam Urben