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Comments: To Whom It May Concern,

I would like to express my concern at the proposed policies that would classify existing and new fixed climbing anchors within Wilderness areas as "prohibited installations" unless they have undergone a Minimum Requirements Analysis and been approved.

I am a new immigrant to the USA, having recently moved to join my wife in California. I believe that climbing is an essential and unique way of experiencing the outdoors, and the US wilderness is admired and coveted by climbing communities around the world for its vastness, diversity, and beauty.

Moreover, the US wilderness has been a training ground for many American climbers who have gone on to achieve great things in the sport across the world - the likes of Kim Hill, Steve House, Brette Harrington, Alex Honnold, Tommy Caldwell (to name but a very few!) all cut their teeth climbing outdoors in US wilderness areas.

My views align with those of the Access Fund, which are that:

1. Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.
2. It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.
3. Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.
4. Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.
5. Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.
6. Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

I do understand that climbing and climbing anchors can have an impact on wilderness areas, and that the safety of climbers using installations in wilderness areas also needs to be considered. However, I urge you to reconsider this approach and to work with the Access Fund, American Alpine Club, and other stakeholders to find solutions that do not start with a default stance that new and existing climbing installations are prohibited.

Regards,

Michael Cawley