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First name: Jonas

Last name: Kaare-Rasmussen

Organization:

Title:

Comments: Thank you for the opportunity to comment on the proposed regulation of fixed anchors in wilderness areas. I have climbed since 2015 and have used many bolts, fixed anchors, and slings within wilderness areas to do so safely and to minimize my own impact in emergency situations. The commitment and adventure involved with these ascents has been a highlight in my life and is the type of activity envisioned by the authors of the Wilderness Act.

The reality is that Fixed anchors are absolutely necessary to facilitate climbing. Fixed anchors protect against the possibility of fatally long falls, facilitate safe points from which climbers can belay each other, and often provide the only means of descent, specifically where walking off a summit is impossible and rappelling is required. Fixed gear also provides a means of rapid descent and self-rescue during emergencies that are weather or personal-safety-related. In many of these situations, without fixed anchors, large rescue operations, or leaving behind gear that will degrade the environment is necessary for the preservation of life.

Fixed anchors have been used in climbing in the United States for approximately 100 years, and climbing was a well-known activity in wilderness areas at the time the Act was passed. Many new wilderness areas have been designated with full knowledge of the presence of climbing and fixed anchors within wilderness boundaries. Fixed anchors were not a factor in the passage of the Act nor were they in subsequent designations of areas where climbing is a major form of recreation such as the Rocky Mountain National Park and Yosemite Wilderness Areas as well as areas deemed eligible for wilderness protection like those within Grand Teton National Park. The same is true for dozens of other wilderness designations. Given this history, there is a strong argument that that Congress never intended fixed anchors to be defined as "installations" or that it intended to prohibit, limit, or regulate climbing any more than it did hiking, hunting or horseback riding. In my view, the agency is not required to take any action with respect to fixed anchors.

To the extent the agency disagrees and feels compelled to go forward with management of fixed anchors, a nationally based approach would be far more efficient than a unit-by-unit process. For example, a national permit by rule or national programmatic MRA could be adopted which simply maintains the 100+ year status quo under which the placement and replacement of fixed anchors is allowed. Any "problem areas" such as bolt intensive sport climbing walls within a designated wilderness can be addressed case by case. Programmatic reviews, permits by rule and nationwide permits are common land management tools- programmatic NEPA, EPA general industrial stormwater permits and the Army Corps of Engineers nationwide Clean Water Act permits are examples where environmental impacts far more significant than fixed anchors are managed on a nationwide basis.

This approach would ensure use of fixed anchors in wilderness will continue in line with historic practice, prevent fixed anchor use that is inconsistent with wilderness ideals and avoids imposing requirements on units without the resources, knowledge or experience to manage fixed anchors.