Data Submitted (UTC 11): 1/30/2024 10:56:00 PM First name: Michael Last name: Bannister Organization: Title: Comments: Greetings,

I'm writing as a climber with 25+ years of experience concerned about possible changes to policy regarding fixed anchors in wilderness areas. Much of my climbing, and especially the most meaningful climbing I've done, has occurred in wilderness, including Yosemite, RMNP, the Black Canyon of the Gunnison, Denali, the Grand Teton, and the wild deserts around Moab. Wilderness and adventure are tremendously important parts of climbings, and both critically need to be preserved.

The proposed regulations aim to reduce the number of fixed anchors in wilderness. While this is understandable, restricting fixed anchors does not necessarily improve wilderness and may even reduce the potential for adventure. As a general rule, the climbing community has policed itself to limit fixed anchors in wilderness. Wilderness climbs use traditional (aka clean) protection by their nature, and climbers are typically loath to use fixed protection unless absolutely necessary. The requirement to hand drill bolts also helps to naturally limit the placement of fixed protection to the bare minimum required. History has shown that climbers have typically respected the ethic of wilderness by minimizing fixed anchors in protected areas.

A multi-pitch climb with minimal bolts for anchors and rappels arguably has less impact on wilderness than a trail. Five bolts, pitons, or other fixed gear over the course of a 1000' is near invisible, even to climbers, whereas a trail can frequently be visible from miles away and changes the character of travel over the land scape far more than a minor number of fixed anchors. The careful application of fixed anchors also helps preserve wilderness by reducing the likelihood of scars due to high impact rescues responding to injuries that can be significantly reduced a minor number of fixed anchors.

Fixed anchors take time, effort, more time, money, and even more time to place. As time passes, they wear out and need to be replaced to ensure their function and safety. Restricting replacement of fixed anchors will add unnecessary complexity to the replacement process, discouraging replacement (typically performed by volunteers with their own funds), and resulting in suspect anchors that were once safe. This increase the likelihood of preventable accidents and artificially prevents climbers from enjoying wilderness climbs that were pioneered decades ago and have been enjoyed ever since. A blanket ban on fix anchors also reduces the potential for adventure by discouraging climbers from attempting new wilderness routes that may or may not require fixed gear. As I mentioned before, wilderness climbers as a rule try to maximize adventure and minimize impact by using a minimum of fixed anchors, with the goal being the use of none.

America has a rich climbing legacy on wild lands, and fixed anchors have been a key part of that legacy and allowing safe climbing in wilderness. Protecting wilderness is critical, but the impact of fixed anchors pales in comparison to its greater threats. Unnecessarily restricting fixed anchors turns our back on that legacy and prevent future American climbers from enjoying the ground breaking climbs pioneered by our forefathers.

Thank you,

Mike Bannister