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Comments: I am writing to advocate for a different approach to the National Park Service and US Forest Service's proposed Federal guidance on climbing fixed anchors in Wilderness. These proposals take many decades of precedent, where climbing has been an appropriate use of Wilderness subject to local regulations, and reverse this orientation to now have climbing anchors, and therefore climbing itself, as fundamentally prohibited but with possible exceptions. Among other things, the proposals lack a clear public process, the absence of which could lead to public health and safety issues. At a minimum, I ask that the National Park Service and US Forest Service include public notice and comment opportunities as part of any final guidance and incorporate engagement of the climbing community into any process that may impact fixed anchor placement in Wilderness.

Climbing, which almost always involves "fixed anchors" for safety, is a recreational pursuit in many wild places that long predates their designations as Wilderness. And climbing was a motivating activity by some of the key people who led to the Act's formation and passing in 1964. While the Act established a mechanism to protect land from trammeling by, and permanent presence of, people, Section 2c defines Wilderness and states in (1):

"generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;"

As such, there are many installations in designated Wilderness that make the land accessible for "outstanding opportunities for solitude or a primitive and unconfined type of recreation" in a way that still accounts for safety and limiting impact on the land. Examples include trailhead signs, the trails themselves, foot bridges over commonly wet sections of trail, and bathrooms. These are substantially unnoticeable installations that are beneficial for multiple generations of citizens' pursuits of profound experiences in exceptional American landscapes.

The proposed guidance from the NPS and USFS are no doubt motivated by real challenges as more people recreate in our Wilderness areas, and as climbing has become more popular. But climbing, more than any other outdoor pursuit, is grounded in a long history and outspoken culture of ethical considerations with constant pursuit of less impact. Consider, for example, NPS Reference Manual #41 on Managing Climbing Activities in Wilderness. It refers to "clean climbing" as the desired norm in wilderness. That phrase comes from the seminal "clean climbing" essay from 1972 by Doug Robinson and Patagonia founder Yvonne Chouinard, which includes, "We believe the only way to ensure the climbing experience for ourselves and future generations is to preserve (1) the vertical wilderness, and (2) the adventure inherent in the experience." So 50 years ago, and for many decades before this, climbers wrestled with their pursuits in wild places and the tension with making these pursuits reasonably safe and accessible.

In my own experience as a climber I can look to the Action Committee for Eldorado (ACE), based in Boulder, CO. ACE was established in 1992 and comprises local climbers to work with the Eldorado Canyon State Park rangers on ways to manage climbing activity in the park. I can remember 30 years ago having to rappel from routes off of tattered webbing slung around small trees precariously growing in small amounts of soil on rock ledges. Years later, hardly any of this exists in Eldorado Canyon. Instead, there are safe and relatively convenient rappel anchors. These anchors are camouflaged in color and they are often difficult to see even when looking for them a few yards away. But gone are the days of having to traverse across a ledge of loose rock to find a suitable tree to throw a rope around, worrying about falling to my death and worrying about the people below whom I might accidentally send rocks falling down onto. And gone are the days of worrying about whether some poor tree will hold my weight. The judicious addition of new bolts, and maintenance of existing ones, reviewed by the

committee of local climbers and the Park staff, has increased safety for everyone while also limiting impact on the landscape.

I do not claim to understand all of the challenges faced by land managers in areas like Joshua Tree National Park that may face extreme amounts of use by climbers and non-climbers, but I believe that we should retain the premise of the past 60 years that climbing is an appropriate use of Wilderness and that this use can be regulated through partnership between the local climbing community and land managers. Radically changing this premise to one where existing and new anchors are prohibited, with limited exception through Minimum Requirements Analyses, will all but eliminate climbing in Wilderness. Instead of these sweeping and radical Federal changes I support legislation like H.R.1380 - Protecting America's Rock Climbing Act, to clearly re-establish that climbing is an appropriate and legitimate use of Wilderness; that the long-standing ability to place limited bolts (without power tools) is legitimate-with-regulation as opposed to prohibited-with-exception; and that clear guidance from our land stewards is critical and should be formed in partnership with the local communities they serve and grounded in the history that connects people to the wild they seek to preserve.