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Comments: Stop the Fixed Anchor Prohibition!

Fixed anchors are integral to mountaineering and climbing, and have been an important part of the rich and valued history of these legitimate wilderness activities for as long as their existence - far longer than the existence of federally designated wilderness itself. The proposed ban on fixed anchors would make zero improvements to wilderness character other than to remove climbers from wilderness by effectively criminalizing their activity. This proposal would criminalize our guide service's historic and current business activities on these public lands in partnership with these land agencies and would severely damage the ability for the guided public to safely access wild public lands with a mountain guide. It would lead to the foreseeable end of the industry of technical mountain guiding in the United States.

Advocates for these draft proposals seek to ban climbers and mountaineers from places based on the use of fixed anchors that they view as incompatible with wilderness character. They are wrong and hypocritical on this point. Far more impactful installations and actions are allowed to exist for the benefit of non-climbers in wilderness, such as: constructed and maintained trails, engineered bridges, established camping sites, vault/pit toilets, permanent and temporary structures and buildings, signage, bear-proof boxes, summit registers, USGS survey markers, animal grazing sites and corrals, scientific instrumentation, meteorological instrumentation, snow survey field sites, fire pits, fences, mining equipment/structures, cairns/trail markers, animal pack trains, and more. Compared to any of these, fixed climbing anchors are less impactful and more essential for safety of those engaged in the activity.

Fixed anchors are generally not seen or otherwise observed or experienced by non-climbers. They are nearly always completely hidden from view from a distance. The apparent motive behind this proposed legislation is to remove climbers from public lands for the benefit of non-climbers. Non-climbers continue to put tremendous strain on wilderness resources in growing numbers. They seek to remove climbers from the lands they wish to go and this proposal is an elitist, patently unlawful, and irrational effort to reduce competition with other users.

Additional points for consideration:

- \* Fixed anchors are essential to the safety system in technical rock and alpine climbing/mountaineering. Prohibiting fixed anchors will impose necessary obstacles to regular maintenance - responsibility currently undertaken by climbers themselves as well as mountain guide outfitters who operate in partnership with federal land agencies. Land managers do not have the expertise to install, remove, or maintain these anchors, and action must be taken in timely fashion. An authorization process will impede critical safety decisions and result in climber fatalities.
- \* Fixed anchors are not prohibited "installations" under the Wilderness Act and any claim that they are is incongruous with the history of what has been allowed under the wilderness act for nearly 60 years and what non-climbing related human installations have been allowed in wilderness in that time. Fixed climbing anchors have been expressly allowed and accounted for in climbing management plans nationwide for decades, establishing precedent and a national standard. It is unreasonable for federal agencies to establish new guidance now.
- \* Climbing is an historic activity on our public lands, nearly as old as the exploration of the lands themselves. Removing the ability to create and maintain climbing anchors would erase some of the world's greatest climbing assets and achievements as part of a rich and lasting legacy of wilderness use.
- \* Rather than a ban of fixed anchors, federal agencies would more effectively ban technical climbing altogether. Climbers take on the risk of needing to retreat or descend from a climb to increase safety. To do so requires leaving a fixed anchor. These anchors should ideally be safe and built to last, rather than a type that is

disposable and suspect for future use. If climbers can't legally retreat or descend, they will be forced to consider the risk of climbing upward (if even possible) against the risk of breaking the law to get to safety. To allow climbing but not fixed anchors would be akin to allowing hiking but not wearing shoes. It would be too dangerous a prospect for most people in most wilderness terrain.

\* Will this be a slippery slope? Proponents of this proposal may next work toward prohibiting all electronics and machines in wilderness, such as emergency satellite communication devices, digital maps on cell phones, cameras, cooking systems, ski/snowboard/snowshoe bindings, trekking poles with mechanical adjustments, and other modern equipment that does not conform to their narrow, inaccurate, and unconventional interpretation of the law regarding wilderness character.

\* Much like "pack it out" programs for trash and human waste in many federal wilderness areas, a fixed anchor ban will be unenforceable and compliance by the public will likely be minimal. Federal agencies do not have nearly enough resources to implement a realistic plan that prohibits the installation and maintenance of fixed climbing anchors, making it futile and impractical to put into guidance. Lawsuits that follow will take decades to resolve and agencies could do more for preserving wilderness character to focus on those priorities.

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