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Comments: Las Vegas is a world class destination for rock climbing. Every year, climbers from all over the world visit Red Rock Conservation Area and Mount Charleston to climb famous routes. Though access to most of these historical routes begins in the Red Rock Conservation Area (governed by the BLM) or Spring Mountains National Recreation Area, many of the routes actually exist within designated Wilderness areas. For example, the most famous traditional climbing route in Las Vegas - Epinephrine - is not in the Red Rock Conservation Area, but the Rainbow Mountain Wilderness. Though this route is not bolt-intensive, several sections rely on fixed protection.

Epinephrine is just one of thousands of routes existing in designated Wilderness in the Las Vegas area alone. If this legislation were to pass, an employee will be assigned to review every single route in existence. Any new routes would require an official application and review process as well, an unnecessary cost to the land managers and taxpayers, likely slowly future route development to a halt. The proposed legislation was created by land managers of Joshua Trees National Park and Black Canyon of the Gunnison National Park, and is not appropriate for other National Parks or land managers of other Wilderness areas. The idea of land managers hiring government employees to review and approve, or remove existing fixed placements in most Wilderness areas is completely unrealistic.

Like Epinephrine, there are thousands of existing climbing routes that technically exist in Wilderness, but border NFS, BLM or NPS land. For example, almost every single climbing route in Yosemite and Zion National Parks are technically Wilderness, though they're only accessed via the National Park system. By requiring a government employee to review every fixed placements as an "installation," this legislation is a de facto ban on new route development. Worse, it's unsafe, and will result in unnecessary injuries and fatalities due to climbers attempting to ascend terrain that is cannot be protected with removable devices.

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. 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.

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.