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Comments: I am commenting on proposals regarding effectively limiting climbing (or in practice, limiting the safety of climbers) in designated wilderness by discouraging placement or renewal of fixed anchors.

First, fixed anchors are an essential part of climbing safety. They can fill gaps where other types of anchors cannot be used, reducing the distance a climber has to ascend at a time and increasing safety. Safety is paramount in wilderness areas given the lack of motorized access and roads, including for emergency vehicles if someone is injured. It does not preserve more wilderness character to have a helicopter airlift flying overhead if that is the only way to get someone out! The absurd purist interpretation of wilderness has led to such an ironic proposal where common sense, unobtrusive measures that can protect anyone are banned, but extremely expensive, polluting, and destructive technology that only the wealthy can afford and otherwise use should be limited to the most urgent, unexpected situations is overlooked.

It is unlikely a ban will remove most of the already installed anchors very quickly, but older installations could well rust, break, and endanger climbers' lives in the meantime -- AGAIN necessitating environmentally damaging, costly, and polluting rescue attempts. The likelihood of full public compliance given this danger is low, further eroding public respect for the Wilderness Act that is already endangered (especially among younger generations) by repeated expansions and redefinitions over the past few decades when its primary purpose should be simple and unchanging: to first protect our natural areas and wildlife from destructive, environmentally damaging, primarily extractive uses such as mining, logging, and motor vehicles.

Another intent of wilderness regulations should be to preserve the natural landscape for future generations to enjoy. Increased use of fixed anchors actually helps with this. Many climbing areas around the world with freestanding cliffs, such as the Saxon Schweiz in Germany, absolutely prohibit the use of temporary anchors instead since the days of pitons, which are notoriously damaging to rock formations every single time they are used. While modern cam devices are a lot better, wear and tear on the rock is still reduced with a proper system of fixed anchors.

The intent should NOT be to stop American citizens, who pay your salaries, from responsibly exploring these areas in ways they have for decades. Responsible exploration requires users to make safety decisions, sometimes in the moment, which are easier and less likely to fail when climbers can use the same fixed anchor systems they have used for decades.

Finally, when Loper Bright and Relentless are decided by the Supreme Court (and soon), it will hopefully bring an end to this practice of federal agencies thinking they are legislators (a function reserved by the Constitution exclusively to Congress) and constantly changing the rules on citizens, and I for one will welcome that. The Wilderness Act sets out what is and is not

allowed, and while there is some ambiguity around terms, nowhere in it are climbing or fixed, non-mechanized anchors needed for climbing safety categorically banned, as reflected by 60 years of previous USFS and NPS policy. In the face of this tsunami heading your way from the courts, it might behoove you to stop blatantly making policy that conflicts with actual statute law before they notice that too. While the proposed USFS policy is not as blatant in this regard as the NPS, rock anchors are NOT and have NEVER been 4(c) installations. Changing the entire meaning of the law like that just needs to stop, and soon thanks to the Supreme Court, perhaps it will. Congress asked y'all to make a policy following the law here, not make up new law.

It is also deeply ironic that conservationists (who are not environmentalists and often care little about the bigger picture) have leaned so hard on a decision from 40 years ago named after and decided in favor of a massive and polluting oil company, Chevron. I will truly enjoy seeing what you have to say when (not if, at this point) Donald Trump is re-elected and your agencies are once again pressured to do environmentally damaging things by the GOP White House and its appointees. Might not be so bad for Congress to be setting the rules then instead of his bureaucrats, eh? Give that some thought.