Data Submitted (UTC 11): 1/7/2024 8:31:22 PM First name: Tim Last name: Wolfe Organization: Title: Comments: Jan 7, 2024 Dear USFS.

I apologize for this being such a long letter but I need to address the very misleading information provided to you by the Wilderness Watch (and additional signatories) in a letter to you that was dated May 1, 2023. Here is a link to the letter:

Fixed anchor sign-on ltr-final (wildernesswatch.org)

First of all I must state that I do not disagree with their premise that "over bolting" to create what is known as "sport climbs" in the wilderness is probably not an appropriate use of the wilderness. I define a sport climb as a line of bolts up a rock face that are positioned close enough together such that almost any fall is safe and the climb does not require the use of removable gear. In general these routes are drilled using a battery operated rotary hammer drill. On rare occasions they are drilled by hand but this takes considerably more time and effort and results in fewer sport climbs being created. I think there are already laws in place that address this: It is illegal to use a battery operated rotary hammer drill in the wilderness. Unfortunately this law is not enforced and the result has been a proliferation of sport climbs in wilderness areas. I believe that simply enforcing this law would be sufficient to mitigate the "problem" since very few climbers will actually hand drill an entire "sport climb." To me it would make more sense to enforce the rules that you already have on the books rather than just create additional rules.

However, what I strongly disagree with in the above referenced letter is that climbers should not be allowed to place ANY fixed anchors on a cliff. That is a recipe for disaster (death, disability, inability to make rescues, etc.). Any experienced climber immediately recognizes that many of the opinions provided in the Wilderness watch letter are disingenuous and misrepresent the truth. Below I quote the obvious misleading sections and the rebuttals to those sections.

Misleading quote 1:

"The use and maintenance of fixed anchors in Wilderness is, and always has been, prohibited by the Wilderness Act's ban on "installations." (Paragraph 2)

This is not factual. This issue has been discussed for decades by park and forest service employees, attorneys and the public. I specifically recall commenting on it in 1999. Climbing hardware has never achieved the Wilderness Act definition of an "installation" and is not in the act's definition of an installation. To imply that it is in the definition and is prohibited is misleading and not true. Since this is the basis for their entire remaining letter, it puts in question the rest of their "facts."

Misleading quote 2:

"a climber may have to accept that a route that cannot be climbed without bolts should not or cannot be climbed at all. Noted climber, George Ochenski, recently told a Salt Lake Tribune reporter that the notion that a ban on fixed anchors is effectively a ban on climbing in Wilderness is, "Total bulls***." Ochenski climbed first ascents in Wilderness for five decades and never used a bolt. And he is fine with the notion that some rock faces may never be climbed, 'which would certainly be no crime against humanity.'" (Paragraph 5) First of all I want to know how a climber knows that a route cannot be climbed until they attempt to climb it? That is the ONLY way you know it cannot be climbed. And what do you as a climber do if you get far up the rock face and discover it is unclimbable? Jump to avoid leaving any fixed anchors on the way down? Of course not. You have to rappel and in doing so you must leave fixed anchors on the rock to safely descend. It is very doubtful that these authors and their "expert" actually have tried to climb a rock face that is too difficult for them or they would recognize this. How can their "expert" be held out as a "noted climber" with five decades of experience who fails to know this obvious fact?

Further research into their "expert" shows him to be a journalist and conservationist but does not show any evidence of notable climbing achievements. In fact I grew up in his back yard (Western Montana) and climbed extensively there for many years. I have never met nor heard of him and am not familiar with him as anything of a local expert. So this man's opinion is not an expert opinion. Rather I suspect he was carefully selected by the Wilderness Watch authors because he would say what they wanted, not what is closer to the truth - which is that fixed anchors are sometimes absolutely critical to prevent death and to allow exploration of unclimbed rocks.

Misleading quote 3:

"Walter Bonatti, known for major first ascents, has noted that with modern

equipment and bolting, '[t]he impossible has been removed from the equation.'" (Paragraph 5) Walter Bonatti is definitely a great and renowned climber. His heyday was in the 1950s and 1960s when many rock faces were unclimbed. He used a technology very similar to bolting but of the prior era - pitons. Pitons cause a lot of damage to the rock, certainly more than bolts, and when left behind as they often are, they too are "fixed anchors." I am not sure how this quote by him is meaningful in terms of the fixed anchors discussion- he just used pitons rather than bolts to create fixed anchors and many fixed piton anchors still exist on routes he established in the Alps.

Misleading quote 4:

"Perhaps as-yet-unattainable wilderness climbs should simply be left as a challenge to the next generation of climbers. In June 2017, for example, big wall climber Alex Honnold made the first free-solo ascent of El Capitan in Yosemite, completing the 2,900-foot Freerider route in under four hours." (Paragraph 6) This statement is nonsense regarding the discussion of fixed anchors and shows the complete lack of insight of these authors. Alex Honnold is recognized by many as the boldest rock climber in the history of the sport. There has never been another human being who has equaled the daring ropeless ascents he has made. Furthermore, if the authors of this letter actually watch the academy award winning documentary of the ropeless ascent he made on El Capitan they would realize he rehearsed the climb using a rope clipped into bolts, pitons and fixed climbing hardware. He fell multiple times working out the proper sequence of moves. He could not have done that ropeless ascent without those prior rehearsal attempts using those fixed anchors. In addition, the movie has a great quote that basically says that what Mr. Honnold did is essentially equivalent to asking an Olympic gymnast (who has also pre-rehearsed their moves) to execute a perfect routine and earn a gold medal - OR DIE. That is what would have happened to Mr. Honnold if he had not used the fixed gear and rope during his rehearsal and if he had not then successfully climbed the route without a rope. Is this a standard that the Wilderness Watch experts believe other wilderness adventurers need to achieve to be allowed to climb in or our national parks and wilderness areas: Succeed first try or die? Please let them to go first if that is the case.

Misleading quote 5:

"In the first catalog for his company Chouinard Equipment, later to become Patagonia, legendary climber Yvon Chouinard pioneered removable climbing chocks and a manifesto of "clean climbing." He wrote, "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... The fewer gadgets between the climber and the climb, the greater is the chance to attain the desired communication with oneself-and nature." (Paragraph 7) Yvon Chouinard was a great climber and a visionary. Removable gear which he created has revolutionized rock climbing. A big push for removable gear occurred because his company's major product - pitons - were causing damage to the rock because the pitons were removed (leaving a scar) rather than being left in place as fixed anchors. This was very bad for his brand. His quote is part of his marketing literature to push climbers into purchasing his new products and using fewer pitons. However, it did not result in his company abolishing pitons from their sales inventory because they were still needed in selected situations and they still generated money. Bottom line is it was a good business decision and good marketing: Both products were needed (increased his company profit) and the removable gear was good for the environment so helped it his company's brand. Pitons

are still sold by this company (now known as Black Diamond Equipment). So the quote above once again is misleading and taken out of context. The real solution in the wilderness is removable gear wear possible AND fixed anchors like pitons and bolts in selected situations.

For the above reasons I hope you will recognize that the writers for Wilderness Watch letter used selective information and quotes to mislead the reader and push them towards their view rather than provide to a balanced viewpoint. They are Straw man arguments. I hope you will discount most of what they say as biased propaganda and not factual information.

Sincerely,

Tim Wolfe