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Comments: The proposed Section 2355 provides unclear guidance and, in some cases, errs with regards to the fact. For this reason, the document should be revised considerably.

\*First and foremost, the document incorrectly classifies fixed anchors as "installations" under the Wilderness Act. The Wilderness Act reads "...there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area." (16 USC § 1133(c)). The terms "structure" and "installation," as codified, are not separated by a comma in this list of prohibited items and, as such, should be understood to refer to a single construct: "a structure or installation". As a unified construct, it is clear that "installation" refers to an edifice-like permanent object. Fixed anchors are not edifice-like: they are far too small in size to be a "structure or installation" in the context of the Wilderness Act.

\*The document should recognize that, in general, bolts do more to preserve wilderness character than alternative fixed anchors. Steel bolts are very small in size and almost impossible to see with the naked eye until they are within approximately 50 feet. When bolts are not available, climbers must use alternatives that are more damaging to wilderness character in order to ascend and descend from climbing routes. For example, when bolts have not been added to climbing routes for descent purposes, climbers must leave behind nylon slings wrapped around trees and rocks. These cannot generally be trusted over time so each climber will leave behind their own nylon sling. These accumulate in wilderness as visual displeasing litter and are also less safe than bolts (see attached image).

\*This guidance fails to make any useful distinction between fixed anchors that already exist, fixed anchors that already exist but need maintenance, and fixed anchors that are proposed in order to make new climbing routes accessible. There are tens of thousands of rock climbing routes in wilderness that rely on fixed anchors. Many of these fixed anchors need to be replaced and each and every one of them will need to be replaced eventually. It is unreasonable that the proposed guidance does not make a distinction between fixed anchor replacement and fixed anchors that facilitate access to new climbing routes.

\*The proposed inventory of each and every fixed anchor that currently exists in wilderness is unreasonable. The agency capacity needed to physically count every fixed anchor in wilderness would be excessive. As proposed, this guidance appears to also suggest that each fixed anchor should then be reviewed for necessity under its MRA. This would require an immense amount of time, resources, and specific expertise. It is not a good use of taxpayer money for the NPS to maintain such a database. Climbers already emphasize "clean climbing" and, generally, use only the minimum number of fixed anchors needed to safely ascend and descend from climbing routes. The current prohibition on using motorized drills in wilderness additionally discourages climbers from excess use of bolts. It takes hours hanging to hand drill a single bolt and no climber is willing to hand drill more bolts than are needed.

\*The proposed guidance fails to fully consider and evaluate tradeoffs with regard to safety. For example, bolts are much safer than other fixed anchors such as slings or pitons. In addition, this document emphasizes the noise created by a power drill as an infringement on wilderness character. With fewer fixed anchors, however, we should expect far more climbing accidents in wilderness. Accidents are undesirable in and of themselves, but it is undeniable that noise generated by a hours-long helicopter rescue makes the noise created by the use of a power-drill for a few minutes wholly negligible. (For an example incident with follow up discussion, please see <https://www.mountainproject.com/forum/topic/122887074/east-ridge-of-wolfs-head-peak-accident-report-july-6-2022?page=1>)

This guidance is correct in recognizing that rock climbing is an authorized recreational use of wilderness. However, this guidance expresses a naïve understanding of the activity and the ways in which it can be practiced safely and sustainably.