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Comments: There are two ways in which the proposed rule on fixed anchors is concerning. The first is related to public safety. There is no way to predict the timeline for reviewing all existing fixed anchors in wilderness areas. These existing anchors provide an element of safety for climbers that use them. If these anchors are in need of replacement but such replacement is prohibited pending review of the specific anchor, this may pose a safety risk to anyone climbing a given climb with such an anchor. Instead of a ban on fixed anchors or replacement of fixed anchors pending a review, the proposal should outline a review process to be used on a case by case basis for the new installation or replacement of fixed anchors. By designating all fixed anchors illegitimate until proven otherwise we run the risk of increased safety hazard to climbers. This may in turn impact the public good due to the potential risk, impact, and cost of accidents in wilderness areas related to anchor failures.

The second concern is related to the validity of climbing as a recreational activity on public lands and in wilderness areas. Climbing has been identified as a legitimate use of these lands. Therefore, existing climbs and their anchors should continue to be considered as legitimate. A more appropriate step in evaluating anchors would be to propose a clear set of rules around the establishment and replacement of anchors moving forward. Safety and access by the public to these public resources would be prioritized, while simultaneously upholding the intended value of this proposal: to establish a set of guidelines around fixed anchors that aligns with the intended spirit of the Wilderness Act and considers impact to all users/stakeholders.

There is an argument to be made regarding the proposed definition of fixed anchors as an "installation", in that the impact of a bolt in the middle of a rock face is entirely dissimilar to that of a road through a wilderness area. Because a climber could theoretically climb the rock without the bolt, the primary impact of the existence of the bolt is simply to provide an element of safety to the climber. Similarly, a nearby crack, protected with removable gear, could theoretically be climbed thousands of times per year. It is difficult if not impossible to assign an "impact" to a given bolt or "fixed anchor" as being more negative than the activity of climbing itself.

If the installation of anchors is the concern (the noise, for example), then banning power drills in wilderness areas is a reasonable rule to adopt. But banning anchors altogether does little to alter or improve wilderness areas and potentially creates harm to climbers by limiting access and harm to climbers and the general public by the introduction of increased and unnecessary risk to climbers.