

Data Submitted (UTC 11): 1/4/2024 2:04:52 PM

First name: Stefani

Last name: Dawn

Organization:

Title:

Comments: As a rock climber since 2007, I have been exploring and climbing in wilderness areas and Forest Service land (and other public land) as a source of joy, exercise, and connection with the rock and nature. Most of the time, we conduct a climb and leave without a trace, using only traditional gear that is removed and then walking off the climb. However there are circumstances where, for safety reasons, bolts are needed to protect sections where traditional gear cannot be used, and/or rappels are required to get down and other natural features, such as trees, cannot be slung.

According to the wilderness act, the definition of wilderness area includes "2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation." In some cases bolts are required to conduct the recreation, and by limiting the ability to use them, the recreation is no longer "unconfined."

Wilderness areas are also supposed to provide solitude, so excessive bolting for "sport" style climbing (that uses only bolts for protection instead of traditional gear) would not fit under that definition. In that lens, I strongly urge you to consider placing limitations and guidelines on the amount of bolting that takes place on a climb. A balance must be struck between over-use of bolts and completely restricting their use for the purposes of safety and exploration.

Please also consider the following with respect to bolts and climbing:

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.

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.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

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.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

Thank you,

Stefani Dawn