

Data Submitted (UTC 11): 1/5/2024 6:30:18 PM

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Comments: The proposed guidance creates an existential crisis for climbers who climb on public lands including designated wilderness.

The proposed guidance language focuses on the appropriateness of fixed equipment in wilderness or according to individual management plans. Climbing equipment including slings, nuts, camming devices and bolts are placed, rather than installed permanently. A permanent installation would imply that items do not require maintenance or have indelible properties. Fixed climbing equipment has a life-span of safe use and as such are not permanent.

Rather than focus on the compatibility of fixed equipment in wilderness, it is my belief that USFS climbing guidance for wilderness and management plans should focus on the method in which the equipment is placed.

In my view it is a mistake for this proposed language to focus on the existence of climbing equipment in the wilderness rather than considering the damage placing climbing equipment causes.

The proposed guidance does not make inquiry into the method of placement of climbing equipment. Many types of climbing equipment can be placed in the rock with no additional alteration to the rock itself and can be easily removed once use has been discontinued. Equipment which causes no damage to resources does not violate the wilderness act.

While the placement of bolts and pitons do alter the rock, many types of bolts and pitons are not permanent 'installations', rather they are removable and enable safe climbing. Equipment such as bolts and pitons have a useful safe lifespan and require maintenance.

With the exception of page 15 statement 5, the USFS Proposed guidance ignores that bolt placement requires a hole to be drilled into the rock. Up until now it has been the policy of wilderness land managers that non-mechanized means can be used for the placement of bolts. Hand-drilling bolt holes is a very time consuming endeavor, requiring around an hour per hole drilled in granite. Hand-drilled bolts are a compatible use of wilderness and are a crucial means of enabling safe climbing in wilderness. The placement of bolts does not pre-suppose that a climbing opportunity has 'sport climbing' characteristics.

Under the proposed guidance a climber can hand-drill as many holes as they want as long as they remove the bolts. This doesn't seem like good policy to me.

The placement of bolts in wilderness climbing opportunities allow for the protection of wilderness resources by focusing use along known pathways of ascent or descent.

Use of fixed anchors such as bolts can reduce impacts to wilderness resources such as trees.