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Comments: I am writing to express my serious concern about the proposed USFS policy to prohibit fixed anchors in wilderness areas. As a person who deeply appreciates the wilderness, nature and biodiversity, and is concerned about the effects of climate change, I can say that I would not have developed these perspectives without my time spent in the backcountry as a passionate climber, backcountry hiker, and skier. In fact, it is precisely because of the ability to experience unconfined wilderness climbing throughout the Western United States, making spontaneous decisions to stay safe while respecting the landscape, that I have changed careers to pursue work in support of conservation.

I personally am extremely concerned about the risk that such policies would create, as many routes are simply not possible to safely walk off of, and the potential of being stranded would be significant. Imagine discovering at the top of a classic route that has been climbed for 50+ years, at sunset, that it no longer has rappel anchors at the top. The impact of scrambling down loose terrain in the dark and risk of rockfall - not to mention backcountry rescues that would be needed in many situations such as this - is often far greater than the impact of limited and judicious use of fixed anchors which will only ever be seen by climbers. Further, removal of existing bolts often scars the rock more seriously than leaving in place, or replacing a bolt in the existing hole.

I appreciate that both the NPS and USFS policy proposals acknowledge that "climbing, including the use of fixed anchors and fixed equipment, can fulfill important wilderness recreational purposes and can help preserve wilderness character by providing opportunities for primitive or unconfined recreation". However, the patchwork and extremely resource-intensive approach to require Climbing Management Plans for every single existing route/anchor and any future requests for anchors takes away the self-reliance of climbers and climbing stewardship organizations that have been managing these decisions for over 50 years, and could contribute to the risks noticed in the paragraph above.

There are better examples of climbers partnering successfully with land managers to preserve wilderness habitat already, such as in Cochise Stronghold, AZ. Seasonal climbing closures in that area have been lifted by the USFS, as peregrine falcon populations have been thriving given the responsible and sustainable actions of climbers in the areas (avoiding nests or areas where falcons are nesting, and by reporting the location of nests when they observe them).

In other areas, such as Boulder where I live, volunteer climbing stewardship organizations work closely with the county, state and other land managers to ensure rigorous review of fixed anchor and bolt requests in places like the Flatirons and Eldorado Canyon State Park. There is a healthy partnership in place that ensures responsible use of our incredible natural resources, and climbers contribute to these organizations, not to mention annual trash pickup events, trail maintenance, commitment to Leave No Trace principles, etc.

I strongly urge you to reconsider and oppose the proposed policies to prohibit fixed anchors in wilderness areas, given the resources it would require to manage, the patchwork nature of the decision-making that would result, and the risk to climbers that could ensue. There are better ways to preserve the wilderness together, and climbers are eager to contribute to these efforts.