

Data Submitted (UTC 11): 1/11/2024 11:57:01 PM

First name: Tomasz

Last name: Falkowski

Organization:

Title:

Comments: To Whom It May Concern,

I am writing to voice my opposition to the draft policies that would make fixed anchors (bolts, pitons, slings) prohibited in America's Wilderness areas. Although I this legislation is likely well-intentioned, the rationale is misguided and the impacts are likely to backfire.

First off, simply, fixed climbing bolts are not a threat to the ecological integrity of wilderness areas. I find it ironic that the National Park Service and US Forest Service are focused on regulating and restricting climbing bolts at a time when climate change and direct environmental impacts associated with fossil fuel, timber, and mineral extraction are far greater threats to the ecological health of wildlands.

By contrast, climbing bolts are relatively benign. Particularly in wilderness areas, where the use of power tools is already prohibited, hand drilling is the only option for installation of climbing bolts. This is a time-intensive, laborious process that is only used in extreme situations necessary to ensure the safety and access for climbers. As such, there are relatively few bolts in these areas. The risk of "grid-bolting wilderness crags" is an imaginary bugaboo.

Beyond that, the environmental impacts of these bolts are limited. The bigger issue is the impact of climbers (e.g., herd paths, human waste), which would be better regulated through other means (better trail design, education, and waste facilities) than a blanket ban on climbing bolts. In fact, removing the bolts, or preventing new fixed bolts to be installed, will likely result in more environmental impacts, as climbers will instead resort to using trees for anchors, which will result in damage in death of these plants, or leaving behind webbing, which would be litter and a far greater eyesore.

Furthermore, climbers are a valid user group of wilderness areas. Fixed anchors are critical to ensure access and safety for climbers. 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.

In an era of climate change driven megafires, I can't imagine wasting resources on enforcing a ban on fixed climbing anchors and bolts. I hope you decide to move forward with alternative regulations that are developed in concert with climbing groups to ensure the protection of our national heritage, ecological wellbeing, and access for the public whose lands these are.

Thank you.

Sincerely,

Tomasz Falkowski, Ph.D.

Assistant Professor of Forestry