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Comments: Wilderness climbing has been a central aspect of my life for decades. The solitude, exploration, and sense of adventure that I feel while climbing in the wilderness has been a consistent source of inspiration and has also led to partnerships resulting in lifelong friendships. In this context, I am deeply concerned about the proposed fixed anchor restrictions. If enacted, the directives would essentially make ground-up adventure climbing illegal, would increase impact on the environment, and would cause serious safety risks that are expected to lead to accidents resulting in death.

Limited, judicious use of fixed anchors has been accepted under existing climbing policies for more than half a century and are not "installations" under the Wilderness Act. Indeed, to use the language of the Act, they are "substantially unnoticeable". Camouflaged fixed anchors are not visible from ground level and remain invisible until encountered while climbing a route.

Changing this interpretation, after more than half a century of judicious anchor use under existing climbing policies, would not protect wilderness. Rather, the proposed change would severely strain existing collaborations between the climbing community and land management agencies while actually increasing impact on wilderness.

Placement and maintenance of fixed anchors in a judicious manner is necessary for safe ascents, and can enable direct descents along the line of ascent of a climb. Without the ability to descend along the same route as the ascent, erosion and de-vegetation would occur due to a need to establish separate ways to scramble down from routes without anchors. Judicious use of fixed anchors substantially reduces the risk of accidents that would require resource-intensive rescue efforts. Moreover, appropriately located fixed anchors make rescue far safer for SAR personnel when accidents do occur that require a response.

When exploring new terrain in a "ground-up" style, which involves substantial self-reliance and adventure consistent with a wilderness setting, there is no way to know if placement of a fixed anchor will be required to enable reasonably safe passage to complete a route. Likewise if terrain cannot be safely navigated or inclement weather occurs, a fixed anchor absolutely must be placed to descend back to the ground. Camouflaged, bolted anchors are the safest, most durable, and lowest-impact option for anchors, and decisions on when an anchor is needed (or must be replaced for safety reasons) must be made "in the moment" based on real-world safety considerations that cannot be determined in advance and subjected to a bureaucratic review and approval process.

Additionally, restricting establishment of new routes to "existing climbing opportunities" on non-wilderness lands is unenforceable and will confuse climbers and land managers. Non-wilderness climbing policies should maintain opportunities for new anchors unless and until an analysis determines climbing should be restricted at a certain site to protect cultural and natural resources.

I am not opposed to guidance on fixed anchor placement in wilderness areas. However the current proposals are unreasonable and unenforceable, will create more problems than they will solve, will create serious safety risks for climbers, and will actually accelerate impacts on wilderness resources. Thus I implore you to reassess the current proposals, and work with the climbing community to consider revised guidance that enables the broader shared goal of safe exploration of the wilderness.

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