

Data Submitted (UTC 11): 1/14/2024 10:01:51 PM

First name: Mark

Last name: Maier

Organization:

Title:

Comments: I am writing concerning the current proposals for regulation of climbing in wilderness areas, specifically the classification of a wide range of historically, and widely, used safety equipment as "prohibited installations." I oppose this reclassification as I believe it is inconsistent with the historical use and character of climbing areas in Wilderness classified regions.

First, the classification of a range of tools from bolts to slings to ice screws and pickets as permanent installations is far too broad. Of these only bolts are arguably close to permanent. The lifetime of slings left behind is perhaps a season. Ice Screws and pickets are rarely left behind and are placed in an ephemeral medium. Proliferation of bolts is a legitimate concern, one that I share, but the classification into "prohibited installations," and then using the complex permitting process proposed, is an over-response and would likely have negative safety and community relations consequences.

*The default prohibition will create safety problems. The proposed permitting process does authorize in-the-moment replacement of existing anchors for safety, but this is unrealistic and does not capture the real process. Climbing parties often remove and replace sling anchors in-the-moment, but almost never do so with bolts, even when the bolt anchor is obviously dangerous, since few parties carry a bolt kit. Parties seeing a dangerous situation report it and existing, less formal, systems take care of replacement. In very popular areas the response time may be a few days. There is no likelihood the proposed permitting process would be responsive on the same timeline and blatantly unsafe situations will persist.

*The regulation change is unreasonable, when considering the history. Use of fixed anchors in wilderness areas has been lightly regulated for over half a century and a large network of practices in the climbing community has evolved based on that. This ranges from how parties prepare to do routes safely to organized and funded efforts to maintain key anchors (e.g. American Safe Climbing Association). There is no reason to suddenly disrupt a system that has worked well.

*The plan is likely untenable in many parts of the country due to Government resources. Climbing is spread very unevenly across wilderness areas. Places like Yosemite and the Wasatch-Uinta areas have thousands of routes, others have few or none. In areas with very high activity the permit application load is likely to be very high, well beyond the local resources to deal with in a timely way. This will result in safety problems and lower the public image of the governing Gov organizations with user groups that are otherwise mostly sympathetic.

*The MRA process is a poor use of Government resources. The prohibition may create a wave of MRA requests. Each will consume Government resources that could otherwise be used in local resource management. Each may create opportunities for litigation and public controversy. The proposals require Climbing Management Plans (CMPs) be developed across the country. Each CMP will require extensive land manager effort and expertise. Relatively few CMPs have been developed. Given the high needs in many areas and back logged maintenance it is hard to see how this is an optimal use of limited resources.

*If there is going to be regulation, it should be targeted and grandfathered. Some of the impact of permitting could be ameliorated by grandfathering in existing routes/areas, especially those with high traffic and high historical significance.

*The broad prohibition (beyond bolts) greatly impacts legitimate exploration of wilderness areas. While few parties carry a bolt kit, most traveling in wilderness climbing areas carry throw-away slings and everybody carries ice screws and pickets in glacier areas. The regulation could be read as prohibiting even these, without a permit, which would essentially cut off travel on glaciers and moderate technical terrain. This would be a grossly unreasonable restriction on wilderness usage specifically allowed under the Wilderness Act.

*More modest and realistic alternatives are available. As an example, the existing prohibition on power drills in wilderness areas is a big disincentive to putting up tightly bolted face climbs but does not prevent safety critical bolted anchors or needed bolt replacement. This is fairly easily enforced and is widely accepted in the climbing user community. Consider similar approaches to mitigating impact that would not be a drain on land manager resources or would impinge on well-established practices.

