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Comments: Thank you for the opportunity to comment on the use and maintenance of fixed anchors in Wilderness Areas. I have been rock and ice climbing in Wilderness Areas since they were first designated by Congress. In this time I have placed many anchors for the safety of my party on rock climbs in the Wind River Range and other Wilderness climbing areas. Most of these anchors were removed in the course of the climb, but a few were left in place out of necessity thus becoming fixed anchors. If one is descending a technical climb, it is necessary to leave fixed anchors (bolts, pitons, nylon slings) to descend safely. It also may be necessary to leave fixed anchors when retreating from a climb due to bad weather, injury, or just being overextended. To require prior approval for placement or replacement of anchors under a Minimum Requirements Analysis is ludicrous. If I find that a fixed anchor on a standard descent route is inadequate, I should be able to replace it immediately and not endanger myself and my companions and future climbers, perhaps fatally, by using a faulty anchor. If I am retreating from a route for whatever reason, I should be able to place a bolt, piton or nylon sling as needed to facilitate the descent. In the case of a sling, the next climbing party on that route will remove the sling, just as you or I would pick up a piece of trash left along a trail.

The use of fixed anchors in our Wilderness Areas predates the Wilderness Act. The requirement for a Minimum Requirements Analysis for every anchor prior to its use immediately endangers all climbers in Wilderness Areas and shuts down rock climbing (within the law) in Wilderness Areas until the process is completed for that area. Prohibiting the placement of new anchors in Wilderness Areas without a Minimum Requirements Analysis will make the retreat from a route under adverse conditions illegal.

Although I am not completely opposed to the regulation of permanent anchors, the current proposed regulations are unworkable and, if implemented in Wilderness areas, will lead to abuse of the regulations or the endangerment of climbers who are conducting an acceptable use that predates the Wilderness Act.