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Comments: I've climbed in our mountains in Colorado, Wyoming, California, North Carolina, New Hampshire, Washington, Alaska, and *always* treat our wild lands with the utmost respect. As a longtime climber (15+ years) and frequent wilderness traveler, I want to communicate my firm disagreement with any policy that effectively bans or overly limits the use of fixed anchors in wilderness and non-wilderness areas.

The alternative to safe, properly installed fixed anchors is leaving webbing and cord (which eventually degrades and becomes trash) and/or rappelling off of trees and bushes, which is often damaging to the vegetation. Both of these options are also more dangerous than using fixed anchors.

Climbers have a vested interest in preserving the primitive, unconfined, and solitary nature of the wilderness. We enjoy and explore these wild places and always try to minimize our impact. Our local and national stewardship organizations are continually educating climbers on how to reduce impact and protect wilderness climbing areas. Climbers have a small impact in wilderness areas compared to other recreational users and hikers, who are present in larger numbers and are generally less educated and more likely to leave trash, go off trail, or otherwise fail to practice Leave-No-Trace principles.

Further, wilderness routes are typically approached in a ground-up style, which involves considerable adventure and self-reliance. The ground-up ethos aligns with maintaining a primitive and unconfined recreation quality of the wilderness. Imposing restrictions on the kind of hardware that can be left when establishing a new route, by definition, confines and restricts the recreation quality of the wilderness and can create very dangerous situations for climbers attempting to climb new routes.

Climbers have been responsibly recreating in the wilderness since before the passage of the Wilderness Act. The existing fixed anchor policy today requires the use of hand-drilling to install fixed anchors, which already significantly limits the quantity of fixed hardware (generally mechanical bolts) that can be installed. Fixed hardware is installed either to protect unprotectable faces and sections between crack systems or to enable safe rappel descent.

The language of the Wilderness Act of 1964 provides a de minimis exception to sparingly-placed fixed anchors. The Act states that a wilderness area "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." Camouflaged fixed anchors have a substantially unnoticeable impact on wilderness areas. They are not visible from ground-level and are generally invisible until they are encountered while climbing a route. They have no significant effect on the wilderness character, and prevent further impact by keeping climbers on specific descent rappel routes on solid rock. Ascent and descent routes with anchors are similar to established trails in wilderness areas that prevent impact like erosion and de-vegetation to surrounding areas.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act - they are "substantially unnoticeable" to use the terminology of the Wilderness Act. Following existing, long-standing 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.

Many summits, towers, and walls require rappel descent. Camouflaged, bolted anchors with stainless steel bolts are the safest, most durable, and lowest-impact rappel anchors. The alternatives to bolted anchors are leaving slings or cords on vegetation, which is both unsightly and can damage sensitive vegetation over time, or slinging

existing features such as flakes, chockstones, or other natural constrictions. These alternatives are much more visible as slings and cord are larger and have a greater visual profile, much less durable as they are susceptible to UV damage, and greatly increase the risk of accidents occurring when damaged cord is used that cannot be properly inspected.

Placing undue and unreasonable restrictions on climbing will not protect wilderness areas but will severely strain a largely beneficial and cooperative relationship between the climbing community and land management agencies. This will benefit neither climbers nor the USFS and NPS.