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Comments: I believe that it is important to regulate the effects that climbing, canyoneering, and other rope-access sports have on Wilderness areas, but I want to make sure that changes to the regulations don't ban established access and established practices.

Specifically, I object to this language:

"that a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes, [...] and] that existing fixed anchors and fixed equipment in wilderness may be retained pending completion of a Minimum Requirements Analysis"

In many places, bolts are the least-impactful way of establishing climbing anchors or canyoneering anchors. If they are removed, users will wrap (and damage) trees, or place ropes on less-ideal lines that cause foot damage to vegetation and soil, or be more likely to be injured and require rescue (which also causes resource damage).

Requiring a Minimum Requirements Analysis seems like an unfunded mandate and a very steep regulatory burden for existing bolts. In most Forests, climbing communities and land managers have established relationships and often rules (and at least community understanding) about what bolting is or is not allowed. Let's make a rule that respects the existing decisions by default and doesn't require impossibly detailed analysis.

In places where these guidelines, relationships, and community standards already exist, let's not require yet another review and "a case-specific determination" that they are appropriate use of Wilderness -- in effect, this will ban bolts in many, many Forests and Wildernesses where they are used sparingly, in ways where they are needed, but not in high enough numbers that they're a high priority for Forest officials.