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Comments: Hi, NPS.

Let me begin by thanking the NPS for always recognizing climbing as a valuable activity and use of wilderness areas. With the uptick in popularity over the last couple of decades, climbing activity in wilderness areas is something that deserves and requires oversight and management.

Climbing has been the main constant in my life, beginning at age 14 and continuing now for me at 43. Climbing has provided me with a continued and healthy avenue of self-discovery and general adventure that's become indispensable to me, even safeguarding me from destructive paths during turbulent times. More than anything else, climbing has formed who I am, and I'm thankful to have safely returned from all my adventures in wilderness areas.

I've left my share of fixed anchors behind, either to safely escape unexpected storms mid-route, or to prepare routes for others to enjoy as I did. My own approach to fixed anchors is that I leave one if it's required for my safe passage either up or for a safe retreat down, and for others to have the same. In either case, the guiding principle for leaving fixed anchors is: minimize impact; return home. I owe both the wilderness and my family that. Often, my decision to leave a fixed anchor happens in the moment, in order to stay safe.

And making that decision in the moment leads me to one of my main concerns with the language in the Draft Reference Manual 41: Evaluation and Authorization Procedures for Fixed Anchors in NPS Wilderness. With the restrictions laid out in the Draft Reference Manual, I would no longer be able to assess on my own, in the moment, and place a fixed anchor for safe passage in an immediate moment of need. The language allows for the NPS and Forest Service to subject every bolt to a minimum requirements analysis and prohibits the placement of any new fixed anchor without a minimum requirements analysis happening first. Further, the language governing a minimum requirements analysis is so vague that there's no clear guidance on what would even constitute the minimum requirements for administration of that area.

The negative impact of the current language is, at least, twofold: climbers are no longer able to make decisions about their own safety in the moment without breaking the prohibition thus violating the federal restrictions; and the NPS and Forest Service could be unduly burdened financially and with resources if the wilderness administrators decide to engage in MRAs for all new and existing fixed anchors.

Again, our wilderness areas deserve that climbing be regulated and managed. However, the language in this Draft Reference Manual is too restrictive regarding the requirement for a MRA for each fixed anchor, and simultaneously too vague as to what counts as minimum requirements for administration of the area.

Please consider removing the language about prohibiting all fixed anchors and trusting the American Alpine Club, Access Fund, and the individual wilderness management teams to help manage the placement, updating, and management of fixed anchors pursuant to the needs and available resources in the respective wilderness areas.