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Comments:

National Park Service January 16, 2024

U.S Forest Service

Re: Guidance for Managing Climbing

Submitted electronically:

NPS: <https://parkplanning.nps.gov/document.cfm?documentID=132387>

USFS: <https://cara.fs2c.usda.gov/Public/CommentInput?project=ORMS-3524>

To whom it concern,

Thank you for the opportunity to comment on the Services' proposed guidelines to manage climbing in our National Parks (NPS) and on U.S. Forest Service (USFS) lands.

I will address only one specific aspect of this proposal: The use of fixed anchors (bolts) within Designated Wilderness and Wilderness Study Areas administered by the USFS and NPS. I oppose the placement or use of fixed anchors within all Designated Wilderness and WSAs administered by the USFS and NPS.

Contrary to what many wanting to use fixed anchors are stating, the prohibition of their use in these select areas will not kill climbing. To be precise, the Wilderness Act of 1964 (ACT) does not prohibit climbing, nor the use of temporary anchors. It welcomes traditional rock climbing, just not the installation of permanent climbing hardware. The Act is considered the "gold standard" for wildlands protection and currently safeguards less than 4 percent of the lower 48 states. Clearly, there are countless climbing opportunities outside Wilderness areas where climbers can challenge their abilities- with permanent anchors. The future of climbing is not in jeopardy with this single restriction.

Those calling for the installation of fixed, permanent anchors claim that it's a matter of safety and that it would bring more folks to the great outdoors. But isn't rock climbing, particularly in Wilderness supposed to be challenging and perhaps just a bit inconvenient and dangerous? Should we then install hand holds on exposed traverses? Should we construct bridges across Wilderness streams considered by some to be unsafe and inconvenient to cross? Should we eliminate grizzly bears in Wilderness to make it safer for humans? As the late Montana author, A.B. Guthrie rhetorically proclaimed during an interview concerning grizzlies: "what is wilderness if not without danger?" Perhaps if something truly feels unsafe, we shouldn't participate, and certainly within a Wilderness we shouldn't demand that the situation be tamed by installing permanent conveniences. To do so goes against the very spirit and ethic of Wilderness.

Fixed anchors (often set in holes made with battery-operated drills) will delineate routes for years and attract more folks because they feel safe and secure clinging to convenient installations along clearly marked routes. How does beckoning climbers to fixed routes mesh with experiencing "outstanding opportunities for solitude or a primitive and unconfined type of recreation," which the Wilderness Act exhorts? As an aside, battery operated drills are commonly used to drill anchor holes in rock face, but because they are mechanized items, their use is prohibited within Wilderness areas.

Others argue- "why not allow permanent anchors, very few will ever see them?" That's like reconciling leaving litter in the backcountry because few will ever see it. What happened to "pack it in, pack it out" and "leave no trace?" Remove the anchors and use them another day. Leave the wild untrammled so another can experience

the thrill of personal accomplishment.

In addition, the 1990 Deputy Assistant General Counsel for the USFS opined that the "...Forest Service may ban or regulate all rock bolting activities anywhere on the National Forest System." In addition, the opinion made the case that fixed anchors (bolts) are in opposition to the Wilderness Act which prohibits "permanent improvements" (fixed bolts are considered as such), as well as being "installations" which are specifically prohibited by the Act. (To the best of my knowledge, this opinion has not been challenged or overturned and very likely would apply equally to the NPS.)

Based on the above opinion, it appears to me that both the NPS and USFS are not in positions to allow the installation of permanent anchors within Wilderness and WSAs. Doing so would be in clear violation of the 1964 Wilderness Act.

Therefore, the agencies forthcoming climbing management decision should make the Wilderness point clear, and it should focus its management planning efforts on the non-Wilderness portions of their administrated lands.

It should be mentioned that not all traditional climbers favor fixed anchors, many prefer the challenge of finding their own way, and when faced with insurmountable obstacles, acknowledging that some faces, some pitches, some mountains are simply too wild to climb- and wild they should remain.

Why must we surrender the meager Wilderness remaining to a small and very select segment of the population? Must we dominate and mar every last vestige of the wild? Have we lost all humility and self-restraint?

Sincerely,

/ Signed /

Franz Camenzind Ph.D.

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