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Comments: I am writing to comment on the proposal/document: Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in U.S. Forest Service Wilderness Areas

As a tax payer, an outdoor enthusiast, a former rock climber and a former NPS ranger, I know first hand how using certain climbing equipment can scar and deface rock walls and other similar geologic structures.

In my opinion, use of permanent fixed climbing anchors and other permanent climbing equipment is antithetical to the experience of climbing in a pristine wilderness area and to the mantra of "Leave No Trace." Experienced rock climbers using rock chocks, wire nuts, wired stoppers, ball-nut stoppers, and similar temporary & removable climbing anchors have no need for permanent, fixed anchors. And aside from the legalities and aesthetics, think about the less-experienced or novice climbers who would attempt climbs where permanent fixed climbing anchors are available...would there be an increase in SARs?

Besides the aforementioned, here are some other, definitive reasons why permanent fixed climbing anchors should not be allowed in wilderness areas:

The Wilderness Act prohibits installations and structures (of any sorts, which would include permanent fixed climbing anchors) in order to protect the areas' wild character. Fixed climbing anchors must not be allowed in Wilderness.

The Wilderness Act's strict prohibitions, including its prohibition on installations, cannot be superseded by a desire to facilitate or enhance a particular form of recreation. A narrow administrative exception for installations does not extend to the general public seeking to create developed recreational activities in Wilderness. We're talking undeveloped wilderness here.

The primary duty of the relevant agencies, which steward wilderness in their care, is to protect Wilderness in its natural and untrammeled state. And the Wilderness Act's ban on installations can ONLY be superseded in those rare (administrative) circumstances where the installation is necessary to protect Wilderness in its natural, untrammeled state.

Under the Act, agencies do NOT have a duty to develop Wilderness to provide "opportunities for primitive recreation." Wilderness, by its very existence, provides these opportunities- agencies need only to protect the Wilderness according to the provisions of the Wilderness Act and to safeguard the opportunity.

Climbing without permanent fixed anchors is generally compatible with wilderness preservation. While it may be true that fewer people will climb certain routes in Wilderness if they don't have fixed bolts or other permanently-installed protection, natural limits on use is not a bad thing when it comes to wilderness protection, particularly with the recent explosion of outdoor recreation uses in Wilderness.

For those climbers seeking developed climbing opportunities, there are ample permanently bolted climbs outside of Wilderness.

Wilderness areas are endangered landscapes. Less than 3 percent of land in the Lower 48 states is protected as Wilderness, and it is under constant threat, including from rapidly escalating recreation pressures. There is no need and should be no desire to escalate other uses that mar the wilderness environment and impact the wilderness experience.

I am thankful that any specific proposals for permanent fixed anchor installations in Wilderness must be subject to public notice and an opportunity for public comment pursuant to the National Environmental Policy Act. And I am forwarding my comment, now on the public record, that the USFS formally and forever forbid the installation of permanent fixed anchor installations and other fixed installations in all Wilderness areas under its jurisdiction. Thank you.