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Comments: Climbing is an activity that relies highly on self-reliance, and allows people to experience wilderness in a way that you cannot by walking on a trail. Climbing aligns with the goals of the wilderness act of 1964 as it does allow for "solitude or a primitive and unconfined type of recreation". We would like to share why having fixed gear is not incompatible with wilderness areas, and how prohibiting the installation and replacement of fixed gear can actually lead to more degradation of fragile environments.

Having safe, well maintained, and strategically placed fixed gear actually reduces impact. This is analogous to having designated trails, which are used in wilderness areas to reduce impact. Having fewer, well marked, designated trails prevents others from making many social trails that would degrade a habitat. Bolts and fixed rappel stations prevent resource degradation in fragile alpine environments. Prohibiting fixed anchors encourages climbers to rappel off of trees and bushes, which can eventually kill cliffside vegetation. Bolted anchors reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location to rappel, rather than a convoluted descent.

Rappelling is the primary cause of death in climbing accidents. When climbers rappel, they rely on an anchor, and anchor failure during rappelling often results in death. Prohibiting the maintenance of anchors or placing bolted anchors increases the risk of anchor failure. This would increase demand on already overworked volunteer Search and Rescue (SAR) organizations and greatly increase the risk of severe or fatal climbing accidents. Restricting the replacement of existing bolts, or the addition of new bolts, would create even more demand on SAR. Rappelling off of bolts or fixed anchors is often the only option for climbers to

self-rescue before activating SAR resources. The proposed directives would prevent climbers from safely retreating from routes without SAR rescue, for example during inclement weather

The new directives will make existing routes more hazardous by discouraging maintenance of bolts and anchors. Fixed gear often needs to be replaced every couple of decades. Without the ability to leave behind equipment or modify existing slings or pitons, climbers will be encouraged to trust the existing gear left exposed to weather over the years. Aging hardware makes climbing routes and descents less safe, which causes more accidents. While the plan does outline a path for getting fixed gear approved, the path to approval is many steps long. This will not only tie up limited time and bandwidth of NPS personnel, but create impractical, long, delays in replacing unsafe fixed gear. Additionally, existing responsible user groups will often be at the mercy of a single land manager. This excessively long process for approval will compromise the safety of wilderness users.