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Comments: I think that the proposed directive is likely to cause harm to wilderness areas, for the following reasons:

Bolts and fixed rappel stations prevent resource degradation in wilderness areas. These types of planned descent routes not only avoid vegetation damage (rappelling from trees, scrambling through fragile sections of alpine plants, etc.) but also create descent options that reduce rockfall hazards, minimize chances of climbers getting ropes stuck on descents, and avoid dangerous situations and costly rescue operations.

Bolted anchors tend to reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location on durable rock surfaces instead of wandering around to assess descent options.

Many summits, towers, and walls require rappel descent. Camouflaged, bolted anchors with stainless steel bolts are the safest, most durable, and lowest-impact rappel anchors. The alternatives to bolted anchors are leaving slings or cords on vegetation, which is both unsightly and can damage sensitive vegetation over time, or slinging existing features such as flakes, chockstones, or other natural constrictions. These alternatives are much more visible as slings and cord are larger and have a greater visual profile, much less durable as they are susceptible to UV damage, and greatly increase the risk of accidents.

Aging hardware makes climbing routes and descents less safe, which causes more accidents. The proposed directive will make existing routes more dangerous by restricting maintenance of bolts and anchors. Replacement of existing fixed anchors should not be restricted in any way.

Rappelling is frequently the primary cause of death in climbing accidents. When climbers rappel, we rely completely on an anchor, and anchor failure during rappelling is very likely to result in death. Prohibiting the maintenance of anchors or any placement of bolted anchors increases use of unreliable natural features that greatly increase the risk of anchor failure and impacts on vegetation.

On wilderness routes, bolts are already placed sparingly. In situations where no removable gear can be placed, bolts are placed to prevent catastrophic falls. Rappelling from some type of fixed anchors is often the only option for climbers to safely retreat from routes without SAR rescue, for example during inclement weather. Prohibiting these placements will lead to potential for more catastrophic falls in the wilderness and more SAR calls. Furthermore, SAR teams rely on fixed anchors to perform rescue operations. Not permitting fixed anchors will jeopardize SAR rescue operations and unnecessarily endanger the lives of rescuers.

For these reasons, fixed anchors are an essential piece of climbers' safety system and should not be prohibited "installations". I think that following existing, long-standing climbing policies that allow the use of fixed anchors for more than a half-century will do more to protect Wilderness character, as well as climbers' lives.