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Comments: Thanks for the opportunity to comment. I appreciate the difficulty of balancing the need to preserve wilderness character against people's desire to recreate in wilderness.

I think that new procedures regulating fixed anchors are unnecessary, would be difficult to administer, and would be dangerous.

First, I would stress that "fixed anchors" are simply incidental to safe human travel in steep environments. People may wrap slings around trees--or use bolts--to rappel when descending steep terrain. One reason that areas now designated as wilderness have remained wilderness is that they are steep and difficult to access. Traveling through many parts of them essentially requires some form of fixed anchor. Last summer, I climbed Starlight and Thunderbolt peak in the Palisades area of the Sierras, which I believe is legally wilderness. Both peaks are steep spires that typically have a sling around draped over the summit to enable descent. Picture here: <https://www.summitpost.org/i-guess-the-mountain-s/18326>. It seems gratuitously dangerous to require people to climb and descend these mountains without the safety of an anchor.

These slings will periodically need to be replaced. It is not practical to set up an application process whereby climbers would apply in advance to replace these slings. The only way to tell whether they need replacement is for climbers on the spot to determine whether the slings need replacing.

The same is true with bolts. On-site inspection is necessary to determine whether they need replacing. And having the bolts in wilderness makes them even less amenable to an application process. It is not practical for a climber to visit a remote wilderness climbing route, determine whether a bolt needs replacing, walk out, apply to replace that bolt, and then hike back in to replace the bolt.

I would stress that the current system mostly works and doesn't need changing. Fixed anchors are inconspicuous and generally rare in wilderness. Hypothetically, if over-bolting becomes a problem, then perhaps the forest service could intervene, but we have not reached that stage, and I'm doubtful if we ever will. Maybe instead of adopting a universal process for approving all fixed anchors, the forest service could discourage overly bolt-intensive climbs in wilderness and reserve the right to remove routes.

Thanks again for the opportunity to comment. Good luck with this process.

Also, restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is not enforceable and would create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.