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Comments: The proposed rulemaking by the Forest Service to treat fixed climbing anchors as "installation" is not only detrimental to climbing access across all wilderness areas but runs against the purpose and spirit of the wilderness act and villainizes one of the most conscientious and responsible user groups accessing wilderness areas.

Climbers have a longstanding tradition, predating the Wilderness Act, of upholding low impact ethics in the wilderness areas they recreate in. This is best exemplified in the bare minimum approach that climbers on the whole take to placing fixed anchors on climbing routes in wilderness areas. From the remote Wind River Range to the popular Yosemite Valley, rock climbers craft routes to follow natural cracks and other weaknesses in the rock to maximize opportunities for placing "traditional" (removable) protection. However, many climbing routes include terrain that is unprotectable using removable anchors. In these circumstances climbers have been able to use their best judgement to place a bolt or other fixed anchor to protect against injury or death in the event of a fall; not as a convenience to simply make a climbing route easier. These anchors are small (typically drilled less than 4" deep in the rock and with a physical presence on the surface of the rock of around one inch); are placed using unpowered hand tools; and most importantly share no similarities to other "installations" they are being compared to like trailhead parking lots, concrete bathrooms, or observation platforms. The ethic of climbers around placing fixed anchors with care and only as needed has permeated climbing for decades and when this ethic has been violated, climbers have been the first to step up and remove the offending anchors to preserve the integrity and wilderness adventure of the climbing route and rock face it's on.

This proposed designation and review approach for eliminating and restricting anchors will not only infringe on climber's ability to ascend rock faces but also puts in jeopardy many climbing routes and areas that either necessitate or benefit from descent by rappel. Potential removal of these existing rappel anchors and the onerous process to install new anchors will force climbers into one of two scenarios on many routes, each with their own hazards to climbers and detriments to the surrounding natural environment:

*"Walking Off" the summit of climbing routes, when this option is even possible, puts climbers in the position of scrambling down often steep and unstable slopes, causing unnecessary impact to the fragile flora and fauna that call these areas home, an unintended outcome of this policy that would run counter to its stated goals. This type of descent also puts climbers at a greater risk of injuries from falls on steep, loose terrain, which in some circumstances could necessitate a costly and impactful rescue.

*Rappelling off of natural features: in this type of descent climbers must visually assess the integrity of boulders, rock horns, tree trunks, or other natural features for their ability to hold the weight of a rappelling climber. This approach not only presents obvious hazards to climbers but would also put undue stress and wear on the trees and unstable rock features that would become the default rappel in lieu of fixed anchors.

For almost 60 years the placement of fixed anchors has been allowed, carefully managed, and authorized under the Wilderness act. The thousands of fixed anchors that have existed in Wilderness Areas predating and during this period have created no major impacts to the environments they are in. Furthermore, the presence of climbers in wilderness areas has had a net benefit thanks to the stewardship, collaboration with land managers, and leave no trace ethic that pervades the climbing community.

This sudden policy reversal is unreasonable and unnecessary!

There is no new crisis or impending problem that the presence of fixed anchors in wilderness areas has or will

cause. Climbers using anchors on existing climbing routes and adding permanent anchors to new routes are not crowding trailhead parking lots, pushing threatened wildlife out of sensitive areas, or pushing wilderness areas to their breaking point. Instead of targeting regulatory efforts to much larger user groups of hikers or vehicular sightseers the Forest Service will be burning the collaborative bridge that climbers and land managers have created and fostered for decades.

Most of all this proposed rule disintegrates the freedom for climbers to responsibly access and recreate in wilderness areas. By putting all current fixed anchors under the threat of removal and creating an impossibly onerous and vague process for installing new fixed anchors, this proposal obstructs exploration of wilderness areas by climbers. I urge the Forest Service to not adopt this proposal and instead focus energy on strengthening the collaborative bond with climbers to better protect the wilderness areas we all love.