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Comments: The USFS and the NPS are both involved in addressing the issue of fixed and other anchors in the wilderness. Each agency has presented the public their proposed language in different formats. I have previously responded to the NPS with these comments. I commend the USFS with your approach to the liability issues vs the NPS, so please disregard Comment 1.

I respectfully submit the following comments. By way of background I have been a climber for over 60 years and am still active. I have climbed in wilderness and non-wilderness land throughout the western United States.

Comment 1- Liability

I can understand why the section on Liability exists having dealt with this in business. I believe it needs substantial revision.

1.1 The evaluation of the adequacy of a fixed anchors is the responsibility of the individual climber. They are the only one who can judge it's Condition at the Time of Use and if it is adequate or needs temporary back-up for it's intended use.

1.2 The condition of every fixed anchor installed begins changing from that very moment. The Government cannot know this condition unless it undertakes a regular inspection program.

1.3 The best way to achieve 1) is to make this clear in the climbing permits that are issued. This has been the unspoken understanding since the beginning of fixed anchors.

Comment 2- New Bolted Fixed Anchors

I understand that there are concerns about the development of new bolted "face climbs" in the wilderness. I share this concern in areas such as the North Cascades in Washington and would support the proposed process there. I do not have a concern in more "urban" wilderness areas where there is a long tradition of bolted routes.

Comment 3- Replacement of Existing Fixed Anchors

I do not support the proposed procedures for the replacement of existing bolt, sling, piton, nut, cam or other type of fixed anchor. Since they are existing, they should be allowed to be replaced with new bolted anchors without going the described process. This includes moving rappel stations from areas of poor rock or subject to rockfall from above, to a protected location. This will be a net overall safety and visual/trash improvement.

Comment 4- Installation of bolts

In general I support banning of using power tools to install bolts in wilderness areas.

I would allow use of power tools if the anchors were being installed as part of a Government sanctioned rescue effort.

Thank you,
David Seman