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Comments: Any Policy change directly targeting specific user groups for permissible activities on public lands must be influenced and informed by direct representatives of those users. The failure to inflict a new fixed anchor policy on public lands without adequately addressing the climbing and SAR communities will generate dramatic and dangerous unintended consequences.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act - they are "substantially unnoticeable" to use the terminology of the Wilderness Act. Following existing, long-standing climbing policies that allow judicious use of fixed anchors for more than a half-century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

Bolts and fixed rappel stations prevent resource degradation in delicate alpine environments. 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.

Aging hardware makes climbing routes and descents less safe, which causes more accidents. Maintenance of existing anchors is very important to the safety of climbers and is labor intensive to perform. The proposed directives will make existing routes more hazardous by restricting maintenance of bolts and anchors.

Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will 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.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

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.

Respectfully,

Troy Corliss