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Comments: Many climbing routes within Wilderness pre-date the Wilderness act and therefore should be grandfathered in the same as other uses such as the permissions of range, chainsaws, vehicle access, ditch maintenance etc. that are still being utilized under grandfather situations. This use has also been a part of several of these areas prior to designation and should be considered an appropriate use of Wilderness under the unconfined type of recreation.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing 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.

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.

The USFS is already underfunded and understaffed. This is a major undertaking you are asking of the agency that already is proving they do not have the current knowledge, skills and abilities with incoming hires. By requiring a MRA process you could be putting climbers at serious risk and could open up the USFS to litigation based on an existing use.

Requiring a MRA for every bolt or fixed anchor would be detrimental to climbers participating in unconfined recreation in wilderness areas. A more common-sense solution that would preserve wilderness character and climbing access would be to ban power drills and require hand drilled holes to be used for bolt installation.

The Wilderness Act states that wilderness be managed to provide "outstanding opportunities for solitude or a primitive and unconfined type of recreation". Climbers and mountaineers come to the mountains and cliffs to immerse themselves in nature and test themselves against the natural world. The act of scaling rock walls is by its very nature primitive and unconfined. Rock climbing and mountaineering and the use of fixed equipment to climb precedes the Wilderness Act and subsequent Wilderness designations. The use of fixed anchors and bolts is necessary in wilderness areas to facilitate safe and environmentally responsible use of wilderness climbing areas. I disagree with the proposed directives assessment that all climbing anchors in wilderness areas be classified as prohibited installations.