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Comments: I am writing to register my opposition to the proposed rules on fixed anchors in Federal Wilderness. I have been climbing a long time and have not observed fixed anchors - especially bolts - as a problem that needs fixing. When I am climbing, I often can't find the bolts that the guide book claims are there. Hand drilled bolts take a great deal of time to install and as a result, are relatively rare in comparison to the amount of space that the Wilderness contains.

When a climb is summited then you are halfway done. You still need to safely descend so as to return to your starting point. Traditionally, climbers have left nylon slings around trees to rappel to prevent damage to trees. If bolts and nylon slings are classified as "prohibited installations" then safe descents will be very difficult if not impossible.

There has been a lot of discussion of the "real" impact of bolts as actually the number of recreationalists that will overrun an area made popular by installed bolts. However, creating trails that reduce the impact of humans visiting an area is already one of the core requirements of maintaining a wilderness area. If human visitation is the issue there are ways to mitigate them including having permit systems such as currently installed in the Enchantments, Mt Rainier NP, North Cascades NP, and other areas in my home state of Washington.

The proposed process of having a Minimum Requirement Analysis (MRA) seems overly complex. Step 1 calls for "Step 1 should discuss how climbing fulfills park and wilderness recreational purposes and furthers wilderness values." The statement makes no effort to focus on the actual issues at hand. No one will bother submitting a MRA for an area that doesn't have climbing and isn't in a wilderness area. The focus is on the harm that will be done by allowing fixed anchors to be installed. Director's Order 41 already affirms that "climbing is a legitimate and appropriate use of wilderness." So why does the MRA need to hash this over again? DO 41 states that bolting should be rare. So why is there a discussion regarding this in the MRA?

What we have today is not perfect - few things are. However the proposed process will require a lot of resources when wilderness areas don't have enough as it is. Hiking around Olympic NP and Mt St Helens last summer we were amazed at all the broken trail signs. We worked with rangers to replace privies in backcountry wilderness camps in the Alpine Lakes Wilderness we were glad to hear that the rangers had their own route to make the signs. Let's see - spend resources on administration and reviews or on things that all visitors can enjoy.

While the current system is not perfect, the proposed changes are not helpful. I encourage you to work with the national and local climbing organizations to improve on the current system.

Thanks

Richard Korry