

Data Submitted (UTC 11): 1/30/2024 4:00:47 PM

First name: Michael

Last name: Dallin

Organization:

Title:

Comments: My background is someone who has placed bolts on non-Wilderness lands for climbing and canyoneering, I am also a guidebook author for the latter activity. My book stresses low impact canyoneering, including using bolts only in rare situations for safety where a natural anchor isn't available or to protect fragile anchor material (e.g., use a bolt instead of a tree if the tree is showing damage from anchors). I am also a major wilderness advocate, and am especially concerned with the wildlife and flora that call wilderness home, and the health of the habitats where they live. For too long the impacts on and the conservation of plants and animals that live in Wilderness have taken a back seat to recreation, which is especially concerning considering habitat loss and the worsening biodiversity crisis, as well as the dramatic and unceasing increase of recreation on these lands. I am very concerned having seen many canyons that were originally descended without bolts (some in Wilderness areas) have since been heavily bolted, mostly to facilitate commercial guiding interests, despite my pleas in my book to keep that from happening. As such, I appreciate that the Forest Service wishes to rein in the current lawless nature of fixed anchors in Wilderness, so I hope this proposal leads to an approved process governing the placement of fixed anchors in Forest Service managed Wilderness. I am fine with the MRA process being used for wilderness units that lack an approved climbing management plan, however I ask that this proposal be changed to allow individual Forest units to write a climbing management plan covering Wilderness areas in their unit, and that the plans can create a different framework for fixed anchor management than the expensive and bureaucratic MRA process. This better allows public input, bureaucratic streamlining and adaptation to the specific needs of each Forest unit and the Wilderness therein. My hope is that each Forest Service unit writes a management plan that allows the public to have a say where anchors are placed, modeled after programs at Eldorado Canyon State Park and the Flatirons of Boulder Open Space and Mountain Parks, both in Boulder Colorado. These units allow for a committee of local, climbing, land manager and conservation representatives approve or deny applications for where fixed anchors should be located, with a voting system for the general public to aid in approval. In addition there are streamlined processes for replacing aging or damaged fixed anchors in a quick timeframe, since safety is a concern in these situations. This is much better than the current system where one person can place these anchors wherever they want without any other concerned parties having a say. Finally, I'd suggest one additional minor change, in that an anchor constructed of removable webbing and a quicklink/rapide, around a natural feature, where rocks are not moved (e.g., rocks in a stream, where animals may live, are not disturbed), should not be considered fixed anchors for the purposes of this planning. However, bolts, pitons, removable bolts, anchors where rocks are moved (especially in watercourses) etc., should be considered fixed anchors for the purposes of this proposal. Thanks so much!