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Comments: On page five of this proposal, the Forest Service recognizes that "[c]limbing has long been an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character of many NFS wilderness areas." This is true. In light of this, we should also recognize that bolts, pitons, and other fixed anchors predate the Wilderness Act, and they have never been considered "installations" under that act. The act was never understood at the time to ban fixed anchors, and nearly 60 years of precedent have enforced this. Bolts, pitons, and other fixed anchors are not installations under the Wilderness Act.

Reinterpreting the Wilderness Act in this way is historically wrong, unnecessary to manage climbing, and quite possibly illegal. An MRA process, which will put small metal anchors up to the same scrutiny as other illegal-by-default activities, will be unfeasible for many managers. I foresee a future where climbers will be faced with the choice of protecting their lives and breaking the law or endangering themselves for the sake of this reference manual.

Maybe it is helpful for me to speak from personal experience. This occurred on NPS land, but I think the experience is relevant here. A few summers ago, I was climbing on Hallett Peak in Rocky Mountain National Park with a friend of mine. After climbing up several hundred feet, we realized we were off-route and getting into harder territory than we had initially planned for. Realizing that we were now unlikely to reach the top of the mountain before an afternoon thunderstorm (a dangerous situation to be in), we bailed, fixing nuts (clean, removable climbing protection) and rappelled to the ground. This action left no visible impact, did not meaningfully affect the environment, protected me and my partner's safety, and would be made illegal by this reference manual. Climbers need to be free to make decisions to protect their safety in precarious moments.

An MRA process is a process for managing exceptions to the rules of the Wilderness Act. This document, therefore, treats bolts, fixed nuts, and slings around trees as illegal until an exception can be authorized. This is totally at odds with the stated importance of climbing historically and as a recognized wilderness activity. Additionally, calling for the review of all existing climbing routes puts in jeopardy climbing's legacy. If more stringent requirements for bolting are to be the future, it should not also mean that the history of American climbing should be put at risk. Existing routes should not be subject to removal, and like-for-like replacements of existing hardware should be codified as the standard in the rules-not subject to an application process.

Also, I believe that restricting the establishment of new routes to "existing climbing opportunities" is confusing and unenforceable. Non-wilderness climbing management policy should allow anchors, unless there is a specific reason to restrict climbing in a given area.

Finally, the protection of climbing should not simply mean the ability to repeat routes. Climbing means, both now and historically, the freedom to explore wilderness and make protection choices on new routes as necessary. While perhaps an application process for a potential 'line up the mountain' may be the future in consideration of the many new climbers now a part of this sport, the MRA burden of climbers proving that a route is "necessary" for the Wilderness Act is onerous and unnecessary for the management of climbing.

Thank you for taking the time to consider my thoughts.