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Comments: I do not agree with the proposed guidance regarding fixed anchors for rock climbing in Wilderness areas. These anchors are a crucial part of the logistics of descending many rock climbing routes in the country where walking or scrambling off is not possible. These are currently not prohibited "installations" under the Wilderness Act, and fixed anchors have been allowed in Wilderness areas for decades at this point.

The suggested Minimum Requirements Analysis (MRA) process, while somewhat logical, would jeopardize the safety of climbers by not allowing them to place or replace anchors in-the-moment as needed. When questing and exploring new vertical terrain, placing an anchor may be required to continue upward, as well as to retreat safely due to the nature of the rock or impending severe weather. Without fixed anchors, personal gear would need to be left behind in a rappel situation, which would break down/rust and potentially become fixed in the rock much sooner than a properly-installed bolted anchor would. Some routes would also be completely impossible to climb and descend safely.

I've also seen many rusty and/or outdated anchor bolts in my 13 years of climbing experience, and imposing unnecessary obstacles to the climbing community to maintain anchors (we take care of that ourselves) would put climbers in an unsafe position. Having more hoops to jump through will likely dissuade climbers from maintaining anchors that need it, putting climbers at risk. The question of whether land agencies have adequate resources to support the numerous MRA's necessary to add additional anchors and preserve existing routes is also important to consider.

In addition, these obstacles could risk the erasing of entire established climbing routes. Places like Joshua Tree and Yosemite National Parks are saturated with climbing history, and I believe that is relevant to our species as a whole. The first ascent of the almost 3000ft El Capitan formation in Yosemite, for example, was ground-breaking in a way that we can all relate to. Having the bolts removed on hands-down classic routes like The Nose would be a massive blow to our community and the world, and these iconic, longstanding routes need to be protected from the threat of removal.

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

I strongly support naturally-painted hardware, especially in Wilderness areas, so users can still enjoy the Wilderness without wondering why there are shiny things high up on the rocks. Personally, I also enjoy seeing the landscape as is without distractions even as a climber, and painted bolts are typically so well camouflaged that they can be difficult to spot even while you're climbing! Compare these fixed anchor options: two painted stainless steel bolts with painted rappel rings that will last decades, or a tattered mess of colorful yet sun-bleached and weakened webbing and/or rope, to which you may decide to add/leave your own loop for redundancy and safety. The second option lasts a season or two at best, creates litter and may be harmful to wildlife, is generally much more unsafe, and is much more noticeable than painted hardware. I believe a requirement for painting/camouflaging fixed anchors in Wilderness areas would not be unwelcome in the climbing community as an alternative.

I appreciate the ability to submit my comments regarding this draft, and I hope they are truly taken into consideration, as are the comments from others in the climbing community. Thank you.