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First name: Brian
Last name: Wulf
Organization:
Title:
Comments: I appreciate the opportunity to comment on this potential piece of guidance. As a climber who volunteers a good bit of time replacing aging & unsafe bolts (fixed anchors), the proposed guidelines are alarming. The potential impact would have a much greater reach than just protected Wilderness areas and I feel would only result in serious injury and potential loss of life. Not only would this be an obvious strain on climbers, but also on park personnel, local search and rescue volunteers, and area first responders. Please consider the points below:
* 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.
* It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.
* 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.
* Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.
* Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.
* Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will 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.
Thank you for your consideration. I sincerely hope this proposal can be withdrawn and improved to benefit both the Park Service, US Forest Service, and the hundreds of thousands of climbers that enjoy our time on these lands.