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Comments: I am writing to oppose the current proposed policies regarding the regulation of fixed anchors in and out of wilderness. The reasons for my opposition are as follows:

1. Historical Precedent

The use of fixed anchors in many current wilderness areas predates the wilderness act and many wilderness areas that have been designated since the wilderness act have a long tradition of fixed anchor use. For instance, when Mark Udall (D-Colorado) pushed for the designation of Rocky Mountain National Park as a wilderness, he did not imagine that the fixed anchors he himself had previously used in the park would be considered prohibited installations. Furthermore, many historical lines that have inspired both climbers and non-climbers alike lie in wilderness and the current proposed policies would make them illegal until they pass a minimum requirements analysis. Under the proposed policies is it possible to justify the existence of the Dawn Wall on El Capitan - the ascent of which was so publicly followed that it got recognition from President Barack Obama - when The Nose, another incredibly historic route, exists nearby and also goes to the top of the formation?

Up until now, the agencies involved in stewarding our wilderness areas have considered fixed anchors to be generally allowable. It is unclear to me why the NFS needs to interpret fixed anchors as installations in order to effectively regulate their use in wilderness. The NFS has shown that it has a number of tools at its disposal to regulate fixed anchors on a case by case basis without the need for such a sweeping new interpretation of the wilderness act.

2. Safety

The use of fixed anchors is paramount to the safety of many user groups, including but not limited to climbers, canyoneers, and ski mountaineers. If a storm rolls in earlier than expected or an accident occurs requiring self rescue, fixed anchors must be left behind in order to facilitate descent. A blanket ban on fixed anchors criminalizes those who are trying to stay alive in dangerous and stressful situations and complicates the risk calculus for those recreating in wilderness. If I am thousands of feet above the valley floor in a storm and starting to become hypothermic, should I not leave a sling or bolt behind to get off the mountain because they are prohibited installations? The proposed policies have very real implications for the safety of individuals even if they are participating in an activity that nominally would not require the use of fixed anchors.

Furthermore, there are already a large number of fixed anchors in wilderness areas. If the proposed policies are adopted, the maintenance of these anchors would be made illegal without an associated MRA. The resources to conduct these MRAs are finite and limited, which would result in many anchors becoming unsafe before an MRA could be completed. These unmaintained and unsafe anchors become a liability for individuals recreating in the wilderness. Users should be allowed to maintain existing anchors without the need for a permit, this is good for users because it allows them to ensure the safety of the equipment they are using, and it is good for the NFS because it obviates a bureaucratic hurdle that would tie up the time of already overworked and underfunded NFS officials.

3. Support for Wilderness

Climbers and other users of fixed anchors are major proponents of conservation and wilderness (e.g., Bears Ears, Oak Flat, RMNP). A blanket prohibition of fixed anchors in wilderness will alienate these user groups and make them less supportive of new wilderness designations in areas that already make use of fixed anchors. We can already see this kind of opposition to new wilderness designations from the mountain biking community. In this time of climate change and underfunding of the NFS, we need to be building coalitions that support the mission of conservation. If the NFS and user groups can become aligned, we can accomplish much more in support of our wild spaces, both on the ground and politically. There are many more important fights that we could all be directing our attention towards, such as mustering political will and funding for the NFS maintenance

backlog.

4. Obstruction of exploration

When someone wishes to explore wilderness and go on the kind of adventure that the Wilderness Act was passed to protect, they may need fixed anchors to facilitate traversal of complex terrain. However, it is impossible to know a priori exactly how much and what kinds of fixed anchors will be required. These uncertainties would make it nearly impossible to file a permit or complete an MRA accurately. Furthermore, it could potentially jeopardize the safety of an adventurer if they must unnecessarily ration their fixed anchors because they did not get the correct number of anchors approved.

5. Enforceability

The proposed policies are incredibly difficult to enforce. I am skeptical that the NFS has the manpower and funding to carry out the MRAs required to approve or remove existing fixed anchors in wilderness areas, let alone new applications for fixed anchors. Even if the NFS could muster such manpower and funding, it is questionable whether the regulation of fixed anchors would be the most efficient use of that time and money.

Outside of Wilderness, the proposal to only allow new climbing routes to "existing climbing opportunities" is wholly unenforceable. Such a proposal would require land managers to know exactly where climbing has already taken place. This kind of detailed history of climbing largely does not exist and the confusion it would create is predictable. What happens when climbers and land managers disagree about whether or not a cliff has "existing climbing opportunities"? I welcome the NFS to be proactive about managing climbing on its lands, but I believe a more tractable approach would be to allow new routes and anchors unless and until land managers determine that climbing should be restricted in order to protect cultural and natural resources.

6. Fixed Anchors control erosion and protect delicate flora

Prohibiting the use of fixed anchors can result in unintended consequences for cliff top erosion and flora. If users do not see anchor or rappel bolts as a viable option (due to bureaucratic red tape) the occurrence of using trees for anchors and walk offs will increase. Cliff tops are often very fragile ecosystems. Tree anchors can damage trees over time, leading to cliff top erosion. Descent trails are another source of significant erosion. Using bolted anchors to concentrate users on durable surfaces is a very valuable tool for preserving delicate cliff top ecosystems and is widely used in managed climbing areas such as the Mohonk Preserve of New York.

In summary, I do not believe that the new policy of interpreting fixed anchors as installations is necessary to regulate their use in wilderness and that such an interpretation would jeopardize the safety of users, negatively impact the history of our wild places, hurt support for new wilderness areas, and could cause unintended consequences for both users of wilderness and cliff top ecosystems. Furthermore, the proposal to restrict new climbing routes to "existing climbing opportunities" outside of wilderness has serious issues with enforcement.