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Comments: To whom it may concern,

I am writing to express my concern about the draft guidance on managing rock climbing in wilderness areas, specifically the prohibition on fixed gear (bolts and slings) as "installations."

I consider myself to be a strong wilderness advocate, and have had the privilege of living in an area with access to a number of nearby wilderness and proposed wilderness areas.

I have also been a climber my entire adult life, a career now spanning close to 5 decades. In that time I have had great adventures on National Forest, BLM, protected and proposed wilderness and other lands. I have established first ascents, drilled a few bolts and (rarely) left slings or other gear when my safety and the safety of my partner required it. I have never been profligate in my use of fixed gear, using it only to establish routes that have some safety margin, and/or to descend. In fact, I have rarely, if ever, come across any wilderness routes put up by others where I thought there was unnecessary fixed gear.

There are a couple of reasons for this. Gear is expensive; drilling bolts by hand is both time-consuming and tiring (depending on the rock, a single bolt might require 30-60 minutes to drill) and climbers would rather spend their time climbing than drilling; and I believe the type of climber who is willing to carry a heavy pack miles into the wilderness to embark on a potentially dangerous adventure is already someone who respects the resource.

Climbing in wilderness areas has been a legitimate use of those areas since their establishment. By prohibiting fixed gear, you are essentially prohibiting climbing itself, as that prohibition takes away the tools of climbing, resulting in unreasonably unsafe conditions. If a thunderstorm is approaching and a climber is 300 feet up a face, they shouldn't have to choose between their safety or not breaking the law.

Enforcement of this rule will be costly, dangerous and likely impossible. If an MRA is conducted and the descent anchors of a particular route are ruled to be unnecessary, who is going to remove them, and how? If the duly appointed "Unlawful Installation Climbing Ranger (UICR)" gets to an established anchor (either by climbing to it or rappelling down to it) and then removes the anchor...how is that UICR then going to descend to the next anchor or the ground? How many UICRs will need to be hired? How will they be trained? How many tax dollars will be spent? I doubt many experienced climbers will volunteer. People like to be the first to climb a route. They don't like being the last. They don't like making access for others impossible, or erasing the history of their sport.

Bolts have negligible impact on the wilderness environment. But prohibiting them would have enormous impact on the one specific wilderness group that relies on them for safety. I urge you to rethink this policy. It is untenable and disenfranchises an historical wilderness user group to for no actual improvement to wilderness qualities.

Regarding the proposed rules for bolting on non-wilderness lands: The proposed restriction of new routes to "existing climbing opportunities" is vague and confusing. Climbers and land managers may have very different views as to what this means. A better option would be to ensure that non-Wilderness climbing management policy maintain opportunities for new anchors unless it is determined through thoughtful analysis that climbing in a particular area should be restricted to protect cultural and natural resources.

Thank you for your consideration.