

Data Submitted (UTC 11): 1/30/2024 11:37:12 PM

First name: Kelly

Last name: Cordes

Organization:

Title:

Comments: Hi, I'm writing to ask you to pause and reconsider your current draft policy on Fixed Anchors in Wilderness Areas. I recognize and appreciate the challenges involved in drafting such policy, but I think more involvement from climbing advocacy organizations (who also respect and revere wilderness) would result in a far better, more informed, and more realistic policy.

For brief background, I'm an avid climber of 30 years, and my love for wild places, including designated wilderness areas, came first; it is the place from which my devotion to climbing arose. I've long been involved in the climbing world, as an editor for the American Alpine Journal, an author, and a climbing and wilderness advocate.

I have read the Wilderness Act, your draft policy, and countless opinions on the issue, and appreciate the complexity. As we know, and as your policy makes clear, climbing is an acceptable activity. The fact remains, too, that our judicious use of fixed anchors in wilderness remains sparing. Such use has been part of climbing from its onset, including prior to implementation of the 1964 Act, which climbers had a major hand in creating. The motorized ban in wilderness, which I and practically every reasonable person supports, is brilliant in its self-limiting nature - it limits bolting (a common type of fixed anchor) to hand-drilling, which is incredibly laborious, and is surely part of the reason that bolt-intensive routes are rare to non-existent in wilderness. Many opponents to fixed anchors jump to the extreme example of front-country sport climbing areas, which often resemble urban parks in their crowded nature - but these are not wilderness areas, with their existing protections, making this fear a false argument. Other fixed anchors, such as slings and nuts used for rappel anchors, are even more sparing, but are necessary for us to safely descend from climbs.

As such, it is hard to see what these new policies accomplish by starting from a position of "prohibited use" regarding our occasional yet necessary use of fixed anchors (I'll concede that there have been rare instance of people violating the wilderness ethic, but anything involving human behavior will include outliers behaving badly). Furthermore, the proposed policies are unenforceable, have no funding attached (thus seem like bureaucratic impositions), and are simply impractical in their real-world allowances for climbers to place needed fixed anchors. The latter especially refers to the MRA process - the same one required to build a bridge or a cabin in a wilderness area - which is wildly unrealistic for our sparing use of fixed anchors in wilderness, given that the need to use such anchors often emerges in the moment. The proposed policies will create confusion and likely compromise safety as climbers will be hesitant to do things like improve old anchors, for fear of violating policy.

Also, on non-wilderness lands, the proposal to restrict anchors to "established climbing opportunities" is an unacceptable policy on regular Forest Service lands. It's onerous, unfair, and unenforceable.

Overall, while I support thoughtful management of climbing in our cherished wilderness, I think the proposed policies should be rejected as they stand, and then improved. Much of the intent is good, but they need revision in some crucial areas. Given that these proposals are directed at climbers, it is imperative to involve climbers in the process. There are many highly respected climbing organizations that should be consulted. I appreciate that this entails a lot of work, but I'm sure we all agree that wilderness is worth the effort.

Thank you for your consideration,

Kelly Cordes