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Comments: I'm writing to express my opposition to the implementation of these procedures, specifically the designation of fixed anchors as "installations." Fixed anchors have been allowed, managed, and authorized in the Wilderness for decades, and their installation and use pre-dates the Wilderness Act of 1964. They are an essential part of the safety system developed by competent climbers. Prohibiting fixed anchors will likely create safety issues and increase resources & taxpayer dollars devoted to rescues and assistance. The process of siting and approving anchors as fixed installations will also likely be very expensive -- and at the expense of US taxpayers and the already stretched NPS budgets -- as it will require site visits in vertical terrain to make necessary assessments. These decisions need to be left up to the climbers in the moment, as they are often critical safety decisions that arise when the climbers are already in situ. Wilderness exploration of the vertical environment has long been seen as a legitimate use of Wilderness land, much as hiking is seen as a legitimate use of Wilderness in the horizontal environment. Hiking trails (both official blazed trails and desire paths) have a much greater environmental impact and more visible impact on the landscape than bolts, most of which are too small and too far off the ground to be visible to anyone but the climbers right next to them. There is also an important historical legacy of exploration and achievement in climbing, recognized globally as among the most inspiring of human endeavors, that would be erased if existing bolts were to be removed per the plan. Finally, the push to prohibit and remove bolts in Wilderness is coming from a minority of activists, seemingly spearheaded by the Wilderness Watch, a now openly activist and political organization that needs to manufacture crises to make sure their donation dollars keep coming in. They were founded to curb the exploitation and abuse of Wilderness by professional guides, specifically to prohibit them from building permanent structures -- campsites and equipment caches in the Wilderness.

<https://wildernesswatch.org/images/about-us/Wilderness-Watch-Founders-Message.pdf>

Minuscule bolts that are barely visible and which have been part of Wilderness management for decades were never part of their original mission. The letter crafted by their Policy Director, Dana Johnson, in opposition to the PARC Act, grossly mischaracterizes what climbing is, how anchors are used, and the broad attitudes of climbers in the community towards bolts and fixed anchors. This letter was cosigned by over 40 conservation groups, which allows her to state that "over 40 groups have written to congress to oppose the bill." Of the many organization that cosigned her letter, none are qualified to understand the issues of how fixed anchors fit into the climbing landscape. Some are animal activists, some are water activists, but all of them are presumably Wilderness recreationists who take advantage of things like hiking/running trails, boat launches, trailheads, parking lots, etc. that, if removed (hypothetically) as illegal installations, would severely impact their entitled use of this national resource. But because their recreational use is not being threatened, they are willing to sign on to a letter supporting action that would severely impact this legitimate use of Wilderness for many American citizens.