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Organization:

Title:

Comments: Dear USFS,

Rock climbing, mountaineering and alpine climbing in the wilderness has been a major part of my life for over 25 years. I have spent countless days climbing in Yosemite National Park, Kings Canyon National Park, Sequoia National Park, Zion National Park, Joshua Tree National Park, Black Canyon of the Gunnison National Park, North Cascades National Park, Mount Rainier National Park, and Rocky Mountain National Park. I have also spent many days adventuring in many non-NPS wilderness areas such as Inyo National Forest, Sierra National Forest, Sequoia National Forest, and San-Bernardino National Forest. This adventure and engagement with the wilderness has been essential for defining my recreation and personal development and I cannot imagine my life without those experiences.

Fixed anchors such as bolts, pitons, and rappel slings are essential pieces of equipment for moving safely in the mountains, and > 99% of the climbs that I have done in the wilderness would not have been possible without those fixed anchors. It is not an over-exaggeration to say that many of the most impactful experiences in my life simply would not have been possible without those fixed anchors, and I am hopeful that climbers to come will be allowed to have those same experiences that are allowed by fixed anchors.

I personally come from a school of thought where it has been very important that the placement of bolts has been kept to a bare minimum to allow safe passage through vertical terrain. In my experience over the past decades, the implementation plan that has been in place in places like Yosemite National Park where climbers are allowed to decide on their own where to place bolts, so long as they are placed without power drills, has been a very effective and simple rule for maintaining thoughtful and minimal placement of bolts. I am a strong proponent of maintaining this system. If the proposed plan to rule that all fixed anchors were illegal, it would possibly eliminate the future of wilderness climbing in the United States.

One major issue that I see with the proposed new interpretation that fixed anchors are installations requiring a minimum requirement analysis (MRA) is that this would eliminate the possibility of the most adventurous ascents in the wilderness. Almost all of the bolts placed in these places have been placed during a first ascent, where a climber ventures out on to a face to see if it is possible to climb, and at times must place a bolt or piton on lead for safety or to rappel. Requiring an MRA for fixed anchors placed in far reaching parts of the wilderness is impractical and could make it impossible to have a wilderness climbing experience.

In short, fixed anchors in the wilderness have truly enabled me to have an adventurous full life and eliminating them by requiring MRA would be devastating for current and future generations of climbers who love to experience wilderness through vertical adventures. I sincerely hope that the proposed rule to redefine bolts as installations is not implemented and that climbers will be allowed to continue to make judicious choices of how best to install and maintain fixed anchors in wilderness areas.

Thank you

Andrew Rollins,

Boulder Colorado