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First name: Bram

Last name: Lovelace

Organization:

Title:

Comments: Hello,

I am writing in response to your proposed guidance regarding fixed anchors within wilderness areas. I am a caver and as such I have concerns that the proposed guidance does not adequately address the impacts it would have with regards to the exploration and preservation of caves within wilderness areas.

Caves are not just features of geological significance, but also can contain features of ecological, educational, scenic, and historical significance. To be able to properly preserve these features, they must first be explored by cavers. Often when this exploration includes a vertical element, the use of fixed anchors is necessary to ensure the safety of the explorer and allow access to the frontier. In contrast to the explosion in popularity of climbing in the last few decades, caving has remained as a niche pursuit, further minimizing the impact had by cavers within wilderness area caves. These caves are often difficult to reach and require technical skills which means that the cavers who are exploring these are people with great respect for and knowledge of the environments they are exploring.

When a dome (vertical passage) is climbed in a cave, the customary practice is to leave a fixed rope at the top for further team members and future explorers to use. By doing this, not only is impact minimized, future exploration is enabled. If every time a group were to access a passage that had been climbed in the past they had to climb it from the bottom again, it would vastly increase the time and effort needed. This would hamper the ability to explore further or perform research within the far reaches of the cave, increase the likelihood of an incident, and vastly increase the impact to the cave environment.

In addition, when descending a natural anchor is not always available or ideal. In these cases, fixed anchors are used to move the rope used for travel. This could take the form of moving the caver away from a fragile formation as they rappel or moving the line of rappel out of a waterfall to make it safe to ascend and descend.

Just as a trail centralizes the impact of visitors and stewards, a fixed anchor and/or fixed rope minimizes the impact of cavers to one specific path. Just as a trail allows hikers and pack animals to move much more efficiently through the wilderness, a fixed anchor allows cavers to move more efficiently and safely through a cave.

I have been lucky enough to participate in trips exploring caves within wilderness areas, including the longest cave in California. On my first trip with a cave exploration organization, we placed a bolt to allow for the safe exploration of a new passage. This passage otherwise would have posed a risk to cavers as it was a muddy slope above a drop, but was made safe by the bolt we placed. It allowed us to continue the exploration of the cave and find significant new passages.

While I understand the concern placed forward about impacts to the cave environment created by the use of fixed anchors, the use of them within the community of dedicated cavers that have the ability and means to place them already follows the techniques of "clean climbing" put forward in the proposal. I hope I have shown how the continued use of fixed anchors is vital to and does not propose a threat to the ongoing exploration, preservation, and enjoyment of caves within wilderness areas. As such I urge you to not restrict the use of these vital pieces of protection within wilderness caves.

Thank you,

Bram Lovelace

Member of the Cascade Grotto of the National Speleological Society and concerned caver