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Comments: Like the vast majority of the Wilderness climbing user group, I fully support the ambitions and effects of the Wilderness Act. However, I believe that a policy reversal in the case of fixed anchor management is a misguided application of the intent of the legislation.

1) Fixed anchors are not 'installations' as per the intent of the Wilderness Act. The Wilderness Act came along decades after climbing began in this country. It was developed and enacted wilderness lovers (including climbers) who themselves had left safety anchors behind in order to experience wild places. The Act was written to prohibit "structures and installations", but these were clearly intended to refer to roads, motors, vehicles and aircraft- not "substantially unnoticed" bits of gear like a sling around a tree, or a ¼" bolt in the rock. These possibilities were known to the authors of the Act, and yet they did not exclude them, because they knew that fixed anchors are an integral part of the "primitive, unconfined recreation" that the Act sought to preserve.

2) The proposed rule change represents an unnecessary and detrimental reversal of a functioning policy. The law as written is an effective self-regulation. The time and effort necessary to hand-drill a bolt hole is itself a sufficient deterrent to the over-placing of bolts in wilderness. No decision to place such an anchor is made lightly, and each is the product of careful consideration by individuals who are taking responsibility for their safety based on real-time conditions.

3) Quality fixed anchors prevent resource degradation in delicate alpine environments. These types of planned descent routes not only avoid vegetation damage (rappelling from trees, scrambling through fragile sections of alpine plants, etc.) but also create descent options that reduce rockfall hazards, minimize chances of climbers getting ropes stuck on descents, and avoid dangerous situations and costly rescue operations. Bolted anchors tend to reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location on durable rock surfaces instead of wandering around to assess descent options.

4) The banning (or requirement of an MRA) for the placement or replacement of fixed hardware is a) unsafe and b) replaces personal, on-the-ground agency with an unwieldy, unfunded, and uninformed bureaucracy. Will this directive be accompanied with increase in funding to the NPS, BLM, USFS, to maintain a team of knowledgeable people that are able to review MRA's within a matter of a few days, or will these new MRAs fall onto an ever-growing pile of things that these underfunded groups will hope to get around to some day?

5) Reversing a functional and long-standing policy will make enemies of Wilderness out of a generally supportive and engaged user group. Wilderness climbers have acted as stewards and advocates for wilderness preservation since before the Act was put into law. All of my friends and climbing partners are continuously picking up trash left by others, informing hikers to not cut switchbacks, and leading by example of LNT principles. An ill-considered policy clumsily restricting the use and enjoyment of public lands for primitive and unconfined recreation is not going to improve this relationship or create future advocates for Wilderness protection.

6) Defining fixed gear as an installation will make criminals of casual users. I couldn't get that cam out. We had to retreat in a thunderstorm and left a sling. The crack system on the new route ended and we had to swing over to the left off a nut. We had to rappel into the ski couloir because the top was iced up. The old anchor halfway down the canyon was swept away in a flash flood and we put a new one in. Are we now in violation of federal law? If this unenforceable policy is actually enforced, how much time and money will it take to process the newly defined criminals? Are there perhaps better uses of federal tax dollars than prosecuting climbers, ski mountaineers, and canyoneers?

The Wilderness Act was never intended to prohibit fixed anchors, use of which long predated the Act and has nonetheless been subject to reasonable regulation ever since. Taking the responsibility for life-and-death, in-the-moment decision making out of the hands of a generally responsible user group and subjecting them to distant, uninformed, underfunded and overworked bureaucracy is a mistake. Fixed anchors are already subject to reasonable oversight, and the MRA process is clumsy and ill-suited manage them.

Thank you for your consideration of these comments.

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