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Comments: I urge the Forest Service to withdraw and significantly modify its proposed directive that asserts that fixed anchors for recreational climbing are "installations" under section 4(c) of the Wilderness Act.

This drastic and unnecessary new interpretation of the Wilderness Act is inconsistent with the historic and continuing recreational climbing activity in designated Wilderness areas around the nation for the past 60 years, indeed long predating the Wilderness Act itself. There are some places in some Wilderness areas managed by the Forest Service where bolts and other fixed anchors are inappropriate and should be prohibited or carefully restricted or managed. But both the Wilderness Act and the agency's other land and recreation management authorities provide abundant and defensible rationales for restricting fixed anchors without treating them as "installations" that require a minimum requirements analysis-an inappropriate management tool for fixed anchors set by recreationists. I urge the Forest Service to use those other means of restricting fixed anchors, where and when appropriate, rather than pursuing a misguided blanket prohibition subject to rare exceptions. The Forest Service has the legal tools available to appropriately manage recreational climbing impacts without a disruptive re-classification of what keeps climbers safe.

Fixed anchors are essential as an option in a climber's safety system. The amount of time required to hand-drill an anchor (in compliance with the Wilderness Act's prohibition on motorized drills) as a practical matter significantly hampers the placement of anchors in Wilderness areas. For example, 45 minutes is a typical amount of time (in my experience) to place a single 3/8-inch-diameter, 2 1/4-inch-long stainless steel bolt in most rock. "Sport" style grid-bolted climbing is neither appropriate in a Wilderness area nor realistic using a hand-drill and hammer. For most backcountry wilderness climbing in remote locations that offer the most exploratory vertical recreational opportunities in the country, the hours needed to place even a modicum of such anchors is time-prohibitive. Hand-drilling in most Wilderness areas, at least in areas not easily accessible to large urban populations or with easy-to-access frontcountry, is, in my experience, quite limited. There are exceptions: evident impacts on locations like Joshua Tree National Park (in the case of the Park Service) can be assessed with an analysis of localized impacts on wilderness characteristics. This assessment does not require a minimum requirements analysis and does not require re-classifying fixed anchors as installations.

I have climbed technical routes in Wilderness areas nearly as long as I have climbed on a rope, for approximately 17 years. In many of those experiences, I have been able to climb without relying on fixed anchors. In other cases, I did rely on anchors placed by other climbers to rappel or establish a safe belay. In one case, I left a fixed anchor in order to allow myself and a climbing partner who'd been injured in a fall to retreat to safety. I have climbed routes that had not previously been climbed that were protectable and safe enough without placing a single fixed anchor. For many types of rock (but not all types) and locations (but not all locations), that approach should be the norm in a Wilderness area.

But the placement, use, and maintenance of occasional fixed anchors for safety purposes, and placed without using a motor, should be acceptable-and without resorting to a presumptive prohibition. In my view, remote alpine rock and ice climbing, especially exploratory climbing, which by its nature involves decisions about risk and safety management in the moment and on the climb, is at the heart of the recreation opportunity the Wilderness Act was intended to provide the public. Such climbing abounds in Wilderness areas. The Forest Service's proposed policy appears to significantly and permanently demote that opportunity. It also appears to significantly jeopardize the continued use and maintenance of existing fixed anchors on some of the most famous and high-quality climbs in the world that are located in Wilderness areas in the U.S.

I have been fortunate to climb routes in Wilderness areas that did require me to place a small number of fixed

anchors, either because of an occasional blank section or because the sheer height or pinnacle nature of a climb meant that reaching the top quickly enough or descending by walking down were simply not possible without a fixed anchor. In no case, in my view, have the wilderness qualities of the location of these routes in Virginia, Wyoming, and Montana been impaired. But assessing potential current or future impairment can be completed by the local federal land managers (as several units of the Park Service have done in recent years), leading to appropriate, tailored local climbing management plans where climbers are congregating-but that don't start from a blanket assumption that all fixed anchors are banned installations unless the agency determines otherwise.

Finally, I have been an advocate for new and expanded Wilderness areas, in a professional capacity and as a citizen. My family has done the same. I spent much of my childhood in the Bob Marshall Wilderness Area and in the backcountry of Glacier National Park managed as de facto wilderness by the Park Service. My grandfather helped lead a citizen fight against the damming of the Bob Marshall for flood control and irrigation purposes on the upper Sun River immediately after passage of the Wilderness Act in 1964. The Forest Service's proposal is counter to my lived experience of wilderness values and recreation consistent with the Wilderness Act. I urge the agency to withdraw and reconsider its proposal.