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Comments: I have been climbing on Federal land for more than 20 years, from New England to California. I never have been as worried about the future of my sport as I am right now after reading the proposed Draft Reference Manual 41: Wilderness Stewardship Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness ("Draft"). The Draft severely compromises safety, radically restricts the recreational opportunities in contravention of the Wilderness Act's purposes, and betrays a lack of understanding of the extremely limited impacts of fixed anchors in Wilderness.

Climbing Is a Legitimate Use of Wilderness and Climbing Requires Fixed Anchors

Climbing is perhaps the sport that most fulfills the Wilderness Act's goal of promoting opportunities for a "primitive and unconfined type of recreation." (See Wilderness Act § 2(c)(2).) Few other pursuits combine self-reliance, solitude (perhaps with one or two partners), interaction with the "geological... features of... scenic... value" (id. § 2(c)(4)), and true freedom that comes with climbing. This is especially true climbing the remote, seldom-repeated, and often serious routes that are found in Wilderness. And the wilderness ethic reaches its peak with exploratory climbing-going where no person has gone before, with no knowledge of what lies above, prepared for any eventuality but with the outcome always in doubt.

But climbing requires fixed anchors. This has been true since Wilderness Act champion David Brower placed bolts on his early ascents, it was true when Congress added the bolt-studded big walls of Yosemite to the Wilderness system, and it is true now. Even routes that can be completely protected by removable gear still can require fixed anchors for descent or retreat. And first ascents can require fixed anchors to descend from dead-ends and impassible sections. There is no separating the use of fixed anchors from climbing-they go together. Indeed, fixed anchors enhance Wilderness by allowing solitary access to the most remote corners of the mountains, where few have ever gone and where few will return. Nothing exemplifies "primitive and unconfined" like feeling hundreds of feet of air underneath you while clinging to what feels like nothing.

Bolts Are Not Installations

The Draft defines bolts as "installations" under the Act and requires a Minimum Requirements Analysis ("MRA"). And yet fixed anchors do not neatly fit into the Act's prohibition: the Draft's conclusion that bolts are "installations" under the Act is not compelled by the Act's language and contravenes its purposes and history.

The Act prohibits "structure[s] or installation[s]" but does not define those terms. (Id. § 4(c).) They sit alongside a list of prohibitions on commercial, industrial, and mechanical impositions on wilderness: permanent roads, motor vehicles, and aircraft. None of the listed prohibitions are as small, unnoticeable, or insignificant as a bolt or an earth-toned sling. From experience, I can state that bolts are often impossible to see, even when one is trying very, very hard to find the next one to clip to avoid a long fall. In the context of the other items that require MRA's, I don't believe that fixed anchors fall within the Act's definition of "installation."

Excluding fixed anchors from the definition of "installation" would be consistent with the Act's allowance of other intrusions on the landscape that are the necessary results of human passage-passage which the Act encourages through its emphasis on unconfined and primitive recreation. Fishers create use trails to high mountain lakes far from official trail systems, yet the Park Service does not require an MRA for each such path (though it may of course remediate or close a trail that has problematic effects). Horse manure is "not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness," yet horsepacking and grazing are permitted in Wilderness without an MRA requirement for each animal's deposit. Nor is an MRA required for the ash of every campfire or the contents of every 6-8" deep cathole. All of these fit the definition of "installation" as much as a bolt or sling, but it would be absurd to require an MRA for them.

The definition of bolts and other fixed anchors as "installations" is also inconsistent with the legislative history and practical history of the Wilderness Act. I am not aware of any of the drafters of the Act urging fixed anchors be banned as a result of the Act's passage, while those same people urged restrictions on roads, vehicles, buildings, and other similar items. Similarly, when areas in Yosemite Valley were added to Wilderness in 1984, I am not aware of any controversy over the use of fixed anchors on those walls, even though the use of fixed anchors was

well-established by that time. The same is true for the designation of much of Rocky Mountain National Park as wilderness in 2009 and many similar situations. This lack of controversy at the time of these designations indicates that Congress did not intend these designations, nor the adoption of the Act itself, to disturb long-established fixed anchor practices in wilderness (so long as they complied with applicable rules, including the Act's prohibition on machinery such as power drills).

Recommended Change: The Draft should be changed to conclude that fixed anchors are not "installations" for the purpose of the Act and that existing management rules (i.e. the prohibition on motorized drills, restrictions on disturbing nesting raptors and archaeological and sacred sites) are sufficient.

The Draft's Restrictions on Replacing Existing Anchors Unacceptably Compromise Human Safety

The Draft places unacceptable restrictions on the replacement of existing anchors. (Draft, p. 4.) Park managers are directed to "evaluate" existing routes in their park before permitting replacement of existing anchors. This evaluation has no timeline and no source of funding is identified. For existing routes that have not been "evaluated," preexisting fixed anchors (including slings) can only be replaced without a cumbersome permit application if the replacement is 1) in an emergency; 2) if necessary to exit the climb in 3) the safest and 4) most expeditious manner possible. Replacement of lead bolts (or fixed pins, or threads, or any other fixed anchor) is not permitted without a permit under non-emergency conditions, or when you're not "exiting" a route, or if you are "exiting" a route under emergency conditions, if it's not done in the "safest" and "most expeditious" manner possible—an evaluation that could be made long after the fact by non-climbers.

This level of restriction for anchor replacement will lead to unacceptable levels of danger. Replacement of fixed anchors is a community responsibility and they require constant upkeep. Fixed slings—a common feature on remote routes where bolts are rare—degrade quickly in the sun and are chewed by rodents. Most responsible wilderness climbers carry a small knife and extra material to quickly and safely maintain these life-critical resources. But such good deeds would be prohibited without an MRA under the Draft. Several climbers have died in the last few years due to compromised slings—an outcome that a ban on replacing them would only exacerbate.

Likewise, the standard for emergency replacements is overly restrictive. Smart climbers retreat when the storm clouds are on the horizon and when the sun is still high in the sky, not when the storm hits and it's already dark and the situation becomes an emergency. Responsible climbers replace anchors long before they wear out because they want to provide a margin of safety to keep the community safe. And climbers routinely make these judgements without oversight from an agency composed largely of non-climbers who are not versed in the tradeoffs necessary to preserve safety in the vertical realm.

The Draft also contains confusing and problematic language relating to replacement of bolts on routes that have been "evaluated." (Draft, p. 4.) The Draft permits replacement of bolts without an MRA on these routes, unless a new hole is required to be drilled. This is an unrealistic and unworkable standard and unjustified by the Act. Often, a bolt requires a new hole because a piece snaps off or bends and can't be drilled out. In some rock types, the hole can degrade and won't take a new bolt. In these cases, it's often easy to fill and patch the hole in a manner that is unnoticeable even if you are inches away. But implementing the Draft procedure would require a replacer to 1. Remove an existing bolt, 2. Discover that the existing hole is unusable, 3. Return to the ground without placing a new bolt, 4. Apply for an MRA for a bolt replacement, a process that will take an unknown amount of time, and 5. Return later to finish the job. During this whole period, the route would be missing the bolt and would be potentially unsafe. This convoluted, unsafe process is nowhere required by the Act and should be removed from the Draft.

Recommended Change: Climbers should retain the discretion to replace existing anchors as needed. The Park Service may continue to evaluate routes and close them only if the routes result in unacceptable risks to other park users or damage to natural resources.

Any MRA Requirement Should Promote Programmatic MRA Procedures that Default to Allowing Fixed Anchors Even if fixed anchors are "installations," the Draft is overly restrictive. An unstated premise of the Draft is that all or most fixed anchors will require an individual MRA for each bolt, sling, or piton. Nothing in the Act prohibits programmatic MRA that can address fixed anchor management park-wide.

An individual MRA process would be cumbersome, resource-intensive, and unnecessary to protect Wilderness values. Both new routes and, importantly, replacement of life-critical anchors on existing routes, would require

waiting for review by Park staff. As staff already have full workloads, and the Draft identifies no new sources of funding, these waits could be long.

Instead, the Service should promote programmatic MRAs for fixed anchor use in general within each park. For example, in Yosemite, a programmatic MRA could assess the historic use of fixed anchors within the Park's Wilderness and set reasonable rules and regulations for new routes and anchor replacement without requiring Park review of each route or anchor replacement.

Recommended Change: The Draft should explicitly acknowledge that parks may use programmatic MRAs to manage fixed anchors, and should explicitly state that programmatic MRAs are the preferred management pathway.

The Draft Improperly Conflates Restricting Fixed Anchors With Controlling Visitation

The Draft notes that bolt-intensive climbs "concentrate[] human activity," in contradiction to Wilderness values. (Draft at p. 16) But controlling bolts (or other fixed anchors) is a poor proxy for managing visitation. To control visitation, fixed anchor restrictions are both underinclusive and overinclusive.

They're underinclusive because restricting fixed anchors would have no effect on the many extremely popular wilderness routes that are done with only removable pro: for instance any crack route that can be walked off. Examples include East Face of Whitney (SEKI), Cathedral Peak (Yosemite), or the Regular Route of Fairview Dome (Yosemite), just to name a few in the Sierra. Some of these areas are popular and plausibly suffer from overuse. But this policy would not address them. (Note: I am not advocating for more restrictions on these areas; these are just examples.)

But the proposed policy is incredibly over-restrictive as to any wilderness routes that do use fixed gear, whether they're popular or not. And it would do so in absurd contexts that could compromise safety, such as retreat due to poor weather, fatigue, or darkness. It would, as written, prevent the replacement of critical safety features on popular routes, for instance the tat loop necessary to do the rope toss/Tyrolean traverse on Sun Ribbon Arete. And it would likewise potentially be incredibly restrictive on truly remote and adventurous styles of climbing: for instance it would potentially prohibit new routes or maintenance of existing routes on the featured but crackless and remote walls on the west side of SEKI: these are a day's hike (at least) from the car and get done single-digit times per year, if at all; but they don't work without some bolts.

If the Parks want to restrict visitation, they have tools to do that: reservations, quotas, tiny parking lots and tow trucks. For instance, the quota system in Yosemite and SEKI, in concert with Inyo NF, is extremely effective at preserving solitary wilderness experiences despite those parks' proximity to major population centers. These quotas keep crowds down far more effectively than restricting fixed anchors would.

Recommended Action: carefully review the Draft for instances where the Park is assuming that restricting bolts and/or fixed anchors will reduce visitation. Evaluate whether the assumption holds true or whether other tools—quotas, timed entry reservations, parking restrictions, etc., could better achieve a goal of limiting visitation (if that is even an appropriate goal).

Conclusion

I believe that the Draft has serious flaws that require careful evaluation. I contest the premise, that bolts and fixed anchors are installations that are in conflict with wilderness values. And I believe that the Draft's specific requirements are unworkable and unsafe. But I also believe that the Park Service is proposing these requirements out of a desire to protect the Wilderness that so many climbers and non-climbers hold dear. I hope the Service learns from this comment and other comments from climbers and comes back with a policy that enhances and protects the long history and tradition of Wilderness climbing in America: because there is no contradiction between climbing and Wilderness. Protecting one protects the other.