Data Submitted (UTC 11): 1/31/2024 3:50:50 AM
First name: S
Last name: H
Organization:
Title:
Comments: I am writing to express my concerns regarding the proposed regulation of fixed anchors. I have been climbing in wilderness areas throughout the United States for the past 20 years for exactly the reasons envisioned in this quote taken from the draft document:

" ... recreational climbing is an appropriate activity in NPS wilderness that connects people with the land, builds self-reliance, presents challenge, and requires skill. These experiential values can provide opportunities for primitive and unconfined recreation ..."

As such I would support a proposal that aims to preserve this type of recreation and continues to allow for the types of experiences I have already had and which the authors of the document state are appropriate. Unfortunately the proposed proposal carries the substantial risk of severely limiting (and in some areas, and cases, completely stopping) the type of climbing which I have enjoyed over the past 20 years and which have been enjoyed by countless other climbers for even longer, and in may cases for decades before the Wilderness Act came into existence. The following summarizes the major concerns I have with the current proposals.

1) The Wilderness Act came into being many years after climbing began in this country and at least some of the people who were instrumental in the act were themselves climbers and wilderness lovers who, during their own explorations, 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 pieces of gear such as slings around trees, or small bolts 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. It is not at all clear why it is now deemed appropriate to change the definition of "structures and installations" so as to include fixed climbing gear. What end is aimed at here? And how do the proposals help meet that end? The answers to these questions are not at all clear in the proposed document.

2) If the current proposals are accepted they will, at a stroke, make all existing fixed hardware "illegal" until such time as wilderness managers are able to assess the hardware to decide whether it is "legal" and if it is not, presumably remove it? In the meantime, the hardware will remain, climbers will continue to climb, and, without considerable resources to enable wilderness managers to assess existing hardware, this situation could well continue indefinitely. It is not at all clear how these changes achieve anything?

3) In addition to making existing hardware "illegal" prior to assessment, the proposal will make it "illegal" to update this hardware to ensure that it is safe for continued use. There is a proposed process for updating existing hardware, but it too relies on time and resources, the source of which is unclear. It is well established within the climbing community that adding fixed hardware to existing routes is unacceptable, but that like for like replacement to ensure the continuing safety of the (minimal) fixed hardware is appropriate. This replacement work is done by volunteers, without resort to power tools and is remarkably effective at ensuring fixed equipment continues to be safe, with minimal impact on the environment. It is worth pointing out, that placing and replacing fixed hardware is time consuming and labor intensive; these facts alone ensure that bolts are placed sparingly and with careful thought as to what is strictly necessary. Introducing a policy that stops this kind of work overnight, and replaces it with an unfunded bureaucratic process will negatively impact the safety of climbers and potentially open wilderness administrators up to liability issues. At the same time it brings no actual benefits and

will likely, over time, result in more accidents, and, paradoxically, more fixed hardware, not less.

4) The proposals around exploration of new wilderness areas which will require pre-approval of every piece of fixed hardware on new routes is impractical. It is inherent to the nature of exploration of the new, that one doesn't know in advance what one will encounter. As such, the idea that a climber can say in advance whether their exploration will require no fixed hardware, fixed hardware only for the descent, or perhaps minimal hardware to make safe upward progress, simply doesn't make sense. It is appropriate for wilderness administrators to ask climbers to consider the impact of their exploration, and to, as far as possible, minimize this impact, but it is also essential to the whole endeavor that climbers be trusted to use their own judgement in their explorations. The current proposals fall short in this regard. They also run the risk of effectively bringing to a halt this type of exploration due to a lack of resources to carry out the type of assessments that are being proposed. Finally, the proposals are in practice unenforceable and as such, it is not at all clear as to how they will help wilderness administrators effectively manage the resource they are charged with managing.

5) Climbers have climbed for recreation and exploration in wilderness areas for many years, and in many cases for many years before those areas were designated as wilderness. In doing so they have, as a community, thought hard about their impact on the places they visit. As a group, climbers are amongst the people most invested in preserving the wilderness character of the places in which they spend time. The question of when, where, and how much fixed hardware is appropriate has long been considered by climbers, and in general, a consensus has emerged that successfully balances preservation of wilderness character with the opportunity for safe exploration of crags and cliffs. Introducing a policy that casts all fixed hardware as illegal until such time as the authorities say otherwise runs the risk of putting that community at odds with the administrators of wilderness. If the goal is truly to preserve wilderness character, it is not possible to do so without the goodwill of people invested in these places and their character. As such, an effective policy needs to contain provision for really understanding what climbing is, and what are the constraints that drive the placement of fixed hardware. It is not enough for a climber to be asked to fill out a form which will be assessed by someone who may or may not understand the nuances that guide whether, when and where climbers will placed fixed anchors. Without this the policies will be ineffective and will not achieve their goals.

In summary.

The Wilderness Act was not intended to prohibit fixed anchors, the use of which often predated the Act.

Taking the decisions around the placement (and replacement) of fixed anchors out of the hands of those whose lives depend on them and putting them into the hands of a bureaucracy which is already underfunded and overworked and which may or may not understand the nuances of what they're being asked to decide, is unsafe, will almost certainly be ineffective in improving the management of wilderness areas and will likely alienate a user group which is highly invested in preserving wilderness areas.

The policy could be greatly improved by (a) recognizing the climbers already effectively maintain safe fixed anchors for existing routes in a manner that minimizes impact and (b) ensuring that real informed input from the climbing community forms a significant part of deciding whether and where fixed anchors are appropriate.

Thank you for giving me the opportunity to comment on the proposals.