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First name: Camille

Last name: Meder

Organization:

Title:

Comments: To Whom It May Concern:

I am writing to comment on the proposed directive regarding rock climbing in wilderness. I am unable to find a way to comment and think I may have missed the comment window but hope that my comments may still be added.

Fixed anchors, including in designated wilderness, are necessary to facilitate climbing- a permissible use of wilderness and a prime example of primitive and unconfined recreation in wilderness. Climbing in wilderness should be unequivocally considered a protected use of wilderness, and fixed anchors are necessary to reasonably engage in this activity and enjoy recreating in and access to the solitude of wilderness. Economically, their use also promotes equity of access, as without bolts the far fewer climbs that are still accessible require expensive and specialized gear which significantly reduces the number of people able to access and enjoy them. The 1964 Wilderness Act calls for wilderness preserved such that "the imprint of man's work [is] substantially unnoticeable." Fixed anchors (of which the hanger that sits on the surface of the rock can fit in the palm of your hand) camouflaged to match the rock are difficult to see from a distance; they thus seem entirely consistent with the spirit of the Wilderness Act, which was created after the historic placement of fixed anchors on some lands later designated wilderness (so the existence of some fixed anchors in wilderness, seemingly, did not contradict the spirit of 'wilderness' to that Act's original writers). The visual impact can be practically eliminated through the use of painting or otherwise camouflaging bolts to match the rock. Additionally, the very right of rock climbers to place these anchors must be preserved to allow climbers a truly free wilderness experience. Earlier generations of rock climbers have benefited from the ability to conduct first ascents, an adventure activity fundamentally consistent with the Wilderness Act. Making such adventures available to a younger generation of climbers is good for these young American athletes (and especially as climbing gains international renown and is now an Olympic sport, we should continue to make it possible for American climbers to thrive and grow). Only by continuing to protect this right can we preserve access to certain truly unique "outstanding opportunities for solitude or a primitive and unconfined type of recreation," as designated by the Wilderness Act.

I urge the Forest Service to impose as few restrictions as possible and streamline any analysis procedures for two reasons: ideological and economic. The first I've already highlighted. Delays and difficulties in getting approval for routes could limit climbers' valid expressions of the Wilderness Act and also cause delays in getting existing bolts replaced (for safety reasons) on existing routes including some of historic importance which draw visiting climbers from around the country and even the world. I worry about the phrasing that implies that some existing routes in wilderness could even be in jeopardy, as this is a part of this country's incredible history of wilderness exploration. Visitors come from all over to appreciate the American wilderness including its climbing (and its long history of climbing). This leads me to my second reason, the economic reason: I worry about the economic cost of conducting a requirements analysis for each bolt placed or replaced, in an already underfunded National Forest System, when our country is already in debt. I should also note the positive economic impact to communities near climbing areas including those in National Forest, and how climbing contributes to this. Climbing opportunities draw many visitors from nearby cities/towns and even internationally and this brings huge economic benefit to local communities. Some of these towns would truly suffer economically with decreased tourism. Facilitating climbing opportunities (including climbs that are primarily bolted- which as I noted earlier are more accessible to more people) makes National Forests especially appealing and accessible to many of these visitors, which is beneficial for many American communities. International visitors, for example, may be more likely to visit areas that are primarily bolted and require less gear, due to the challenge of traveling with additional heavy gear. Of course, certain types of rock (in certain geographic areas) are naturally far less easy to protect with removable gear (such as "slab" type routes without cracks) and thus require bolts to be climbed safely.

Areas with this geology, therefore, would be disproportionately affected by reduced permissions to add bolts in wilderness.

I wonder, therefore, whether a streamlined process might be better economically and more in spirit with historical interpretation of the Wilderness Act. I believe that other options can be considered, such as requiring that all new bolts placed be properly camouflaged to match the rock (an option which practically eliminates visual impact with no financial cost to the Forest Service). Thank you for taking these thoughts into consideration.