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To whom it may concern,

As an American citizen and frequent visitor to federally-designated Wilderness areas, I would like to make the following comments on the Forest Service's implementation of the PARC/EXPLORE Act(s).

The Forest Service should make clear the guidance is an attempt to comply with the EXPLORE Act's mandates regarding fixed climbing anchors, not any mandate of the Wilderness Act. Under Section

4(c) of the Wilderness Act, permanent climbing bolts/anchors are prohibited "installations," and this has been the Forest Service's formal opinion for decades.

The Forest Service must prioritize preservation over recreation. With

less than 3 percent of the contiguous U.S. designated as Wilderness, these lands must be managed to preserve their wildness first. Additionally, the Forest Service still has an overriding statutory duty (not

just authority) under the Wilderness Act to preserve wilderness character and ensure recreational activities?whether generally prohibited activities or not?are administered in a manner that keeps wilderness preservation primary. It is well-settled that the

Forest Service is not at liberty to elevate recreational activity over preservation of Wilderness.

To comply with the Forest Service's duty to preserve Wilderness, the guidance should also provide a clearer, non-discretionary framework for the approval, placement, maintenance, and oversight

of fixed anchors, including making climbing management plans mandatory before permanent fixed anchors may be placed or replaced. The Forest Service must also not allow new bolted routes

in Wilderness until a climbing plan is completed. The agency does not allow the public to develop and maintain their own hiking trails in Wilderness, and the same should go for new bolted climbing routes in Wilderness.

It is an established fact that recreational climbing and climbing infrastructure create a direct environmental toll, including rock face damage, soil compaction, erosion from user trails,

and wildlife disturbance. Climbing management plans must address this. As required under the Wilderness Act, the Forest Service must also ban the use of motorized drills for placing fixed

anchors. The current draft guidance allows a loophole where climbing groups can request exceptions, which will inevitably flood Wilderness with loud, disruptive machinery. The agency must issue a total, non-discretionary ban on motorized rock drills for all recreational activities in Wilderness.

Finally, the Forest Service must be clearer about liability issues stemming from the allowance of third party installations in Wilderness, including liability for the agency itself and for

climbers and climbing organizations who may be taking formal responsibility for placing and maintaining climbing anchors that the public will utilize for high-risk sport.

Thank you for your careful consideration of my comments.

Sincerely,

Tim Lawnicki

