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Comments: Since the National Park Service (NPS) does not install or maintain fixed anchors, which are mainly a community resource, the responsibility for managing, replacing, and removing them should be shared with established climbing organizations and high-level national organizations such as the Access Fund. My primary concern with this directive is the risk of assigning this responsibility to local land managers who may lack understanding of climbing, potentially hindering the establishment of a safe climbing environment due to inaction or resource limitations.

If climbers are ultimately responsible for our safety and the safety of installed hardware, the community should maintain partial "ownership" of routes. This involvement could include participating in surveying, maintaining, and establishing climbing hardware and anchors. Just as established hiking trails minimize dispersed impact, rappel stations and anchors should also be used as a means to create minimal impact by climbers. Successful examples exist in private climbing areas like the Shawangunk Range, where there is a strong ethic of "clean climbing". The Gunks Climbers' Coalition, a local climbing organization, has an Anchor Evaluation Committee that actively surveys fixed hardware. This committee prioritizes hardware replacement based on environmental impact (such as protecting trees from damage when they may be used for anchors) and recommends replacing compromised anchors with bolted rappel stations. Without additional funding or resources, it is unlikely that land managers would effectively manage even existing routes.

In busy and high-use climbing areas, where climbers assume established or published information about hardware, it is safest for climbers to promptly replace any damaged hardware. Informing climbers on a route-by-route basis about missing anchors or compromised bolts could become challenging through a permit process, potentially causing delays and confusion, especially affecting less experienced climbers.

Fixed anchors and bolts should not be perceived as inherently prohibitive in the wilderness, as their impact and the impact of climbers constitute established and legitimate forms of recreation in the wilderness