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Comments: America's National Parks and National Forests are under unprecedented threat, from forest fires and tree die-offs, to invasive species, to damage from climate change-fueled weather disasters, to the pressures caused by record numbers of visitors. The NFS and NPS are already underfunded and understaffed to address these critical problems. Why, then, is this the time to propose a suite of incredibly labor and time intensive policies to regulate the placement of rock climbing anchors? These anchors, which each measure about one square inch and are placed in some of the most inaccessible locations in the world, are visible for the most part only to climbers who have taken great efforts to reach them. If one were to rank the human impacts in our parks and forests, rock climbing anchors would certainly not be in the top 50.

The proposed regulations require every park and forest superintendent in the nation to develop their own climbing management plan and then analyze on a case-by-case basis the appropriateness of fixed anchors on each route or rock face. This is a task that would take thousands of person-hours in each individual unit, and in many cases would be totally infeasible - there are probably hundreds of thousands of climbing routes spread across the nation's National Forests and Parks, and there is no centralized database of their location or type of equipment. Of course, this regulatory change comes with no connected funding for the additional personnel who would be needed to conduct these analyses. Therefore, the proposed approach for a blanket prohibition on fixed anchor installation or replacement until analyses are completed will in practice mean that this vital safety work would be blocked for years or decades, while the bureaucratic backlog is processed. All the while, existing bolts will be rusting and becoming more dangerous each day. If anchors in a particular place are ruled illegal, there is no provision for how they will be removed; such work requires specialized skills and training that only rock climbers possess. Instead, such anchors (which currently receive regular replacement) would simply deteriorate gradually until they become dangerous traps likely to fail under the weight of future climbers. Effective real-world policy must match the amount of management and enforcement work to the severity of the problem being solved. In this case, the proposed regulations are vastly out of scale with the wilderness impacts of fixed anchors. These regulations will unnecessarily burden already overtaxed land managers while making climbing more dangerous and more illicit.

This is not to say that climbing is without any impact or should be free from all regulation. The climbing community is acutely aware that every person's presence in the wilderness comes with some impact, and climbing organizations across the country have arose in the last several decades to voluntarily minimize these impacts. Organizations like the Bay Area Climbers Coalition, for which I volunteer, conduct thousands of hours of volunteer work each year to manage trails, clean climbing areas, educate climbers on best practices, and thoughtfully manage the installation and replacement of necessary climbing anchors, while removing unnecessary, old, or dangerous hardware. We also work with land managers to establish good-faith regulations that help limit climber impacts while maintaining climber access. The climbing community has been incredibly supportive and compliant with these efforts, from temporary closures to protect endangered species and Native American cultural heritage and practices, to backcountry quota systems, to the use of new systems to dispose of human waste. Climbing organizations like ours stand ready to work collaboratively with land managers to develop thoughtful, low-effort regulations that help minimize the impacts of the growing climbing community.

Although the number of climbers has been growing rapidly in recent years, fixed anchors in wilderness are not new, are not growing quickly, and have in fact been thoughtfully self-managed for over 50 years. As the fixed anchors manager for the Bay Area Climbers Coalition, I am acutely aware that although fixed anchors are small, their placement makes a permanent change to the rocks that I love. I, and all other climbers like me that do this work, do not take the decision to place anchors lightly. In fact, the topic has been a subject of intense debate within the climbing community for decades; bolts that are seen as unnecessary are quickly removed, and their

installers receive significant social consequences. Our community is in remarkable agreement around the principle that routes that can be safely climbed without placing bolts should never be bolted. Fixed anchors at the top of pitches (usually two bolts with small rings) are added only on routes that are likely to receive high amounts of traffic or where lowering by rope is the only feasible method of descent. Many famous wilderness routes have no fixed anchors of any sort, despite being climbed by hundreds of people over many decades. When I choose to place a bolt or anchor, it is only after much specific thought around the safety of future climbers, the protection of the rock and nearby trees, the likely use patterns of the crag, and the historical ethics and character of the climbing area in question. The climbers who use these crags regularly are the only people who are qualified to make these difficult and complicated decisions.

Climbers have been successfully and carefully managing the use of fixed anchors at rock climbing crags across the globe for almost century now. No one cares more about the preservation of wilderness climbing areas than we do. We stand ready to assist development of reasonable regulations to address any impacts that climbing may cause, but the current systems of minimal governmental regulation combined with robust self-management and volunteer stewardship are working well to manage the impacts of climbing. Please do not saddle the Forest and Park units with the unmanageable, unenforceable, unfunded responsibility to decide the fate of every piece of climbing hardware on the cliffs in their jurisdiction. Such a plan is a lose-lose for both land managers and climbers.