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Comments: To Whom it May Concern,

This is my second comment on the proposed regulations. In my first comment, I emphasized that while I, and the Bay Area Climbers Coalition, would support common-sense, low-effort regulations to manage bolts in the National Parks and National Forests, the currently proposed regulations are administratively unmanageable and unenforceable, and will lead to less accountable stewardship of fixed anchors, rather than more. Below I would like to propose what I believe is a better system for fixed anchor management.

Most climbers care a lot about the preservation of the rocks and walls on which we climb, and the natural areas around them. While we of course don't agree 100% about the best ways to care for those rocks and places and the people who use them, the underlying values and care are remarkably aligned. As for specific bolts on specific routes, climbers have been arguing since the beginning about where it is and isn't appropriate to place a bolt. Rather than evidence of dysfunction, I think this is actually the messy but necessary process of trying to come to consensus around the self-management of places we all hold dear. And overall, this informal process has been remarkably effective for about 70 years at keeping existing and new routes safe, accessible, and consistent with local ethics.

Of course, as any community grows, there is a point where informal systems of accountability need to become more formalized. I'm sympathetic to the concern that the swelling number of climbers might lead to a wave of thoughtlessly placed bolts. So far, I have not personally witnessed this despite much time spent at crags of all types across the country, but I'm open to the idea that other people may have a different experience here. So, if some more formalized regulation of bolting is necessary, now or soon, how should it be done, and who should do it?

I feel strongly that the best approach is a balanced one, with volunteer or elected councils of experienced local climbers partnering with land managers from the relevant agencies. The decision about where to bolt and where not to bolt requires specialized knowledge and judgment that only experienced local climbers possess. Asking overworked park or forest officials who likely have never climbed to review individual anchor permits is a recipe for poorly informed, painfully slow decisions. Since the parks and forests are vast, these decisions will be virtually unenforceable, so there must be respect for the decision makers and buy-in from the climbing community, or route developers will just go incognito and be even less accountable than they are today. The only effective deterrent from people doing whatever they want on wilderness walls has always been, and will continue to be, social sanction from fellow climbers.

Given all this, I think a model that seems to have proved successful in Boulder Colorado should be replicated around the country. There, the park service responsible for the flatirons partners with the local climbers coalition to make decisions on fixed anchors. The park service sets general guidelines and regulations, and the climbers coalition reviews applications for specific anchors (with the climbing community getting a vote through public comment) and makes recommendations for approval or denial to the park service. Specific expertise for specific decisions, and community credibility. The current proposal being put forward has neither of these things, since it was decided unilaterally, and seems bureaucratically unmanageable and unenforceable.

As a lower-effort alternative or a transitional measure while we build these kinds of government-climber partnerships, I would suggest that rather than pre-approving specific routes, the NPS and NFS issue permits to individual climbing route developers (experienced climbers with the skills necessary to install fixed anchors). These developers would agree to abide by the regulations of the area, while using their best judgement on bolt

location and upkeep, and would document all work done and report back to the land managers.

I urge the NFS and NPS to rethink the currently-proposed unilateral policies, and work together with local and national climbing advocacy organizations to build robust, engaged systems for stewardship in the decades to come.

Sincerely,

Will Skinner
Rebolting Manager
Bay Area Climbers Coalition