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First name: Christian

Last name: Black

Organization:

Title:

Comments: I am writing to voice my stance on the classification of "fixed anchors" in a climbing context being subjugated to review by park authorities or personnel, or therein categorized as potentially "prohibited" features needing review.

I have been a climber for over a decade now, during which much of my formative time was spent in wilderness settings on National Park lands enjoying climbing routes, an almost ubiquitous feature of which involves "fixed anchors". In addition to being a climber, I served as a Climbing Ranger for Yosemite National Park and worked alongside Climbing Management plans. This is to say, I have a deep understanding of both the "climber" side and "climbing management" side of the issue at hand.

In my opinion, the classification of bolts, slings, pitons, screws etc as "fixed anchors" needing the review of park management poses problems that are both at odds with the reality of climbing development and route maintenance, as well as at odds with the ability of the National Parks or USFW agencies to effectively manage from afar through permitting. See below.

1. Climbing development, including the use of "fixed anchors" and placement of bolts has been a longstanding historic practice on public lands, and stands as a valued and valid form of recreation in the wilderness. As routes age and hardware needs replacement, it is an already self-managed process by which climbers replace bolts as needed. Typically a climber looking to replace bolts will contact the first ascensionist for permission before any alternation or replacing of bolts, as is standard for the sport. If not available, the climber will then look to the local ethic of the climbing area for guidance, which can vary based on location (for example, historically bolting has greater or less acceptance depending on the area).

2. "Fixed anchors" such as bolts can have the ability to preserve the character of the rock to a greater extent than natural protection in some cases. For example, the soft sandstone of Zion National Park or Red Rock Canyon National Preserve can be prone to breaking under the forces of small trad gear. In these frequent cases, a well placed bolt both preserves the natural character of the rock and allows for route longevity.

3. From my experience as a Climbing Ranger and time working with the National Park Service, I am acutely aware of the fallbacks of over-management. In areas with lots of climbing routes that will need hardware replacement in the near future on historic routes, the effectiveness of permitting bolt replacement will have little effect, as park and public lands staffing is often already overwhelmed with more pressing matters. It is my opinion that any resources or money going into reviewing the use of "fixed anchors" would be better suited towards education on wilderness and local ethics.

In conclusion, climbers are some of the most intimate users of the wilderness, and as such have historically been at the forefront of preservation and are regular educators to new wilderness users. It is my opinion that climbers themselves are in the best position to self-manage the niche sub-category of climbers who develop routes or update existing hardware. I believe a better use of funding would be supporting climbing outreach and education programs within the park and educating new wilderness users.