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Comments: Bolts in climbing are an essential part of climbing for ensuring safe ascents on what would otherwise be unprotectable by removable protection. A permit and evaluation process is an unnecessary and prohibitive step in what is already an arduous process. I believe it is unnecessary and ineffective given the following:

1. Under current rules bolts cannot generally be placed with an electric or gas powered drill and must be placed by hand. While not as heavy, a hand drill, is not a lightweight thing but placing a bolt by hand takes significant dedication and time. In most rock types this takes around an hour minimum in ideal conditions. This is generally in places with an approach that is not trivial. To establish a bolt intensive face climb in most circumstances is simply not physically feasible. Adding administrative hurdles to such a difficult endeavor is likely to diminish what little enthusiasm exists for establishing climbs with significant bolting to likely nothing.

2. There is not such a significant amount of bolt intensive climbs in remote wilderness areas to make this process necessary or enforceable. In places where approaches are not very far or difficult these areas lack the wilderness character anyways and any establishment of bolt intensive climbs is unlikely to further affect that character. In places that do have the remote and wild character we've come to expect from wilderness the aforementioned difficulties of physically establishing such climbs make them unlikely. Furthermore though the NPS lacks the resources to patrol these types of places and will have significant difficulty in establishing when these fixed anchors appeared. Prohibiting them may be logistically impossible in places like Yosemite, Denali, or The Black Canyon where someone installing a bolt may only be seen and heard by their partner and the surrounding nature. Removal of long established bolts thought to be new or leaving new bolts will lead to friction between the public and parks.

3. The public's understanding of administrative processes and boundaries is very minimal but even within the agency understanding of different designations is complicated. Wilderness, Wilderness Study Area, proposed wilderness, and other designations are administratively treated the same or similarly while they are legally not the same. In my experience many administrators and rangers do not understand the differences and simply treat them the same thereby creating an unnecessary barrier in places it is not required and an additional administrative burden on staff.

4. The climbing community tends to be fairly self policing. Style is inherent in the nature of a sport where boldness and creativity are valued. Where people establish bolt intensive climbs that the local community feels those bolts are unnecessary they will often be removed with social stigma and ostracization following. Many climbing areas work with local community organizations and climbing advocacy groups to create a fixed hardware process and policies based on community consent and involvement. A better use of public resources would be in encouraging such public processes while also providing a structure to manage the rare rogue individual who may feel their personal guidelines are more important than the rest of the local community. Establishing partnerships with such organizations would yield many of the desired outcomes of this policy and additional institutional knowledge without the burdens and difficulties of an administrative process.

For these reasons I do not believe an evaluation or authorization process is necessary or of benefit to the general public.