

Data Submitted (UTC 11): 1/3/2024 8:48:18 PM

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Comments: I am writing to voice my stance of the potential classification of fixed anchors in a climbing context under review by the park authorities and personnel.

I have been climbing for 7 years now, and have been fortunate enough to have spent time in many Forest Service Lands. These experiences were formative and important in my development both within the context of climbing and as a person and citizen.

In my opinion, the classification of slings, bolts, pitons, screws, fixed nuts, and other climbing hardware as fixed hardware as fixed anchors are at odds with the abilities of the Forest Service, unrealistic for the logistics of rock climbing, and will diminish climbers' abilities to enjoy historic routes that are part of what makes visiting these areas so incredible.

Climbing development, including the placement of bolts, has been a longstanding historic practice on public lands, and stands as a valued and valid form of recreation in wilderness. As routes age, these pieces of hardware will need replacement. Currently there is an effective system in place where climbers will replace these pieces of hardware, usually with the permission of the First Ascensionist before altering, replacing bolts. If they are not available to grant permission, the climber will then look to the local ethic of the area. Some areas have more or less acceptance of bolting, and the character of the routes often is kept in line with this standard. Local ethics and traditions would likely get glossed over if there was a nation-wide bolt ban on placing bolts in wilderness.

Fixed anchors such as bolts have the ability to preserve the character of rock better than natural rock climbing protection (e.g. cams and nuts). Climbing routes in Red Rock Canyon or Zion National Park have friable rock that can sometimes break under the forces of small traditional gear. In these very frequent cases, a well-placed bolt can preserve the character of the rock as well as the longevity of the climbing route.

I am concerned that over-management of these pieces of hardware will result in confusion for both park administration as well as climbers. I know the Forest Service has a lot of pressing matters on its plate, and I am truly worried that historic routes will become too dangerous to climb as bolts or pitons age, and updating them will be out of the hands of climbers. This could result in more money spent by the Parks Service on Search and Rescue, as these bolts are often placed in areas that would otherwise be too difficult or impossible to protect. Many, many historic routes require updated hardware. As the Forest Service is already overwhelmed in terms of resources and staffing, I believe that money and resources should instead be directed to education on wilderness and local ethics.

In conclusion, climbers are some of the most intimately engaged user group with the wilderness, and have been historically at the forefront of preservation. Climbers already serve as educators to new wilderness users both in the Forest Service as well as numerous members outside of the Park Staff. It is my strong opinion that climbers themselves are the best sub-group to manage the niche of developing climbing routes and updating existing hardware. I believe Forest Service funds would be better used to support climber outreach and educating new wilderness users.