

Data Submitted (UTC 11): 1/4/2024 6:55:06 PM

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Comments: Fixed anchors are an essential piece of protection for climbers. They offer the safest access possible to many climbing areas and allow for face climbs that otherwise would never be climbed. Fixed climbing anchors make sport climbing possible. Eliminating these anchors or making difficult to maintain would erase the rich history of sport climbing in America. The types of climbing that are less bolt-intensive still (traditional climbing and top-rope climbing) make use of fixed anchors. Traditional climbing makes use of fixed anchors at belay stations. Only the trad climbs that allow for a walk off will allow climbers to climb without fixed anchors for rappels and expecting top-rope climbers to set up a trad-style (i.e. removable) anchor is unreasonable, especially as top-rope climbing is intended to be the most accessible form of outdoor climbing. Top-rope climbers often don't have the cams, slings, and nuts to set up their own anchors, and that specific crag might not offer cracks or opportunities for natural anchors. As established before, traditional climbing is great but is much more expensive than sport climbing.

It is also worth stating that removable climbing anchors, or specifically removable bolts, are not a reasonable expectation for sport climbing. They are difficult to use and are significantly weaker than well-maintained fixed anchors (bolts and hangars) that could occupy the same hole. Asking climbers to place their own removable bolts as they climb would be ridiculous and would result in American sport climbing-one of the safest climbing disciplines-becoming one of the most dangerous.

To take the anti-bolting argument to its logical end, only the most low-impact of climbing forms should be allowed, the forms that don't leave anything unnatural behind. This only permits bouldering and free soloing, and while these types of climbing should be allowed, many iconic and beautiful routes are thereby inaccessible.

The expectation that there be no trace of human existence in the wilderness areas is a romantic but childish one. If hike Angel's Landing in Zion National Park, or the Half Dome in Yosemite, you could complain about the extensive use of chains, cables, railings, and anchors there. However, without this safety equipment these areas would be much more dangerous and much less accessible. Now, I don't think that every desert tower or granite peak should have stairs carved into it with chains and railings fixed to the rock, but I'm glad that there are a few that do have them. These two trails are historic and iconic-people want to go there. The same thing occurs for countless climbing routes. There are people that want to climb the historic route, becoming part of that history themselves. The great difference here is that the pieces of protection left behind by climbers (bolts and occasional pitons) are invisible to the naked eye from more than thirty or forty feet away, while these chains, railings, steps, and more are quite visible at much larger distance.

Federal agencies have allowed, managed, and authorized fixed climbing anchors for decades, and it is unreasonable to now walk back on that history to restrict this type of climbing, and will obstruct the exploration of these wilderness areas.

To be clear, there are many places that could have bolted climbs on them that should not. Bolted sport climbs in close proximity to unbolted traditional climbs are often times unnecessary and fail to provide a unique enough experience to justify their impact. Because of this, certain areas (Zion NP) have only a few bolted sport climbs as compared to hundreds of trad climbs. There are other parks that have their own restrictions on bolting that allow the park to maintain its character. Each national park has different rock, rock formations, and climbing opportunities, and thus bolting and fixed anchors should be protected generally with specific restrictions applied by the individual park.

This proposal restricts the establishment of new routes to "existing climbing opportunities" on non-wilderness

lands will create confusion. Such restrictions are unenforceable and should be replaced with provisions for new anchors in the absence of analysis stating that climbing in such areas should be restricted to protect natural and cultural resources. There are certainly areas that need such protections, but they should receive it as explicit analyses are done.

America has a rich climbing legacy, and sport climbing is an important part of that. I sincerely hope that the National Park Service takes responsible and reasonable steps to protect the rock, the climbers, and the experience for all involved with this in mind.

Thank you.