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Organization:

Title:

Comments: Forest Service Planning Commission Team:

As an avid rock climber with over two decades of experience climbing the diverse landscapes of the United States, I am writing to express my position on the Fixed Anchor Evaluation And Authorization Procedures Draft. I respectfully urge the Forest Service to reconsider this proposed policy, redraft, and ease the use of current and future fixed anchors in wilderness areas as well as non wilderness areas. Reasons include the critical role fixed anchors play in ensuring climber safety and the preservation of the American climbing heritage. I love wilderness and non-wilderness areas (primarily for climbing, but not solely), and want generations to continue to explore them, and explore them safely without dramatic bureaucratic oversight and overreach please.

I agree with your ethics in their essence and don't want our wilderness areas in particular to turn into over bolted, sport climbing crags and I think an eased policy can be written that allows for belay/rappel anchors to be placed on new and established routes and descents where no other options exist, replacement of all existing fixed anchors can continue, and new route development continue in line with the established nature of the specific area. This could be accomplished with a greater partnership between the climbing community and your specific management via locally or regionally climber-led and managed advocacy groups communicating and working with forest supervisors. A more informal auditing system as opposed to the proposed MRA/permitting system could be employed. Clauses in the statute could be written to more appropriately guide these practices, to prevent over bolting and grid bolting with penalties for developers who do overbolt as agreed by the local climbing advocates in consensus with forest service leadership. Penalties could include remediation, financial penalties, barring individual access, or warnings towards area closures.

I firmly believe that fixed anchors are an integral aspect of a climber's safety system, that do not affect the wilderness nature even though they are close to the definition of a permanent installation. In challenging wilderness terrains, where traditional protection might be insufficient or unavailable, bolts provide crucial anchor points that enhance safety, reducing potential risks associated with falls and accidents. I have been grateful when climbing unprotectable terrain to find both intermediate and belay anchor bolts, which helped my safety. This did not affect my enjoyment of the overall nature of the wilderness area I was climbing in, and I don't think it affected any hiker's enjoyment as well because they were oblivious and on the ground.

Maintenance of existing established routes is a fundamental aspect of preserving climbing routes' integrity and safety. Bolts are subject to wear and tear over time, and disallowing their maintenance could pose serious safety hazards to climbers who rely on these routes. At the least, the policy should be eased and relaxed, grandfathering in all existing fixed anchors and allowing for appropriate bolt maintenance at all times, not just unevaluated emergencies, which are imperative to ensure the continued safety of climbers and the sustainability of these routes.

Moreover, the historical context of climbing over the past five decades has seen a prevalent use of bolts in established routes across various national parks and wilderness areas. This historical precedent underscores the importance and acceptance of bolts within the climbing community, acknowledging their role in making climbing routes feasible and safe as judged by climbers.

I would love to see more development of the education piece FSM 2355.03, para. 9 (guidance, training, and financial support) included in the revised policy for all climbers (both developers and climbers enjoying established routes) both for the nature and understanding of fixed anchors, but also for climbers to follow the Leave No Trace guidelines (primarily waste management and travel on durable surfaces).

In conclusion, I respectfully request an easing and redraft of the policy towards more blanket and generalized fixed anchor protections as opposed to a route by route permit/MRA system. Belay/rappel anchors should be allowed to be placed on new and established routes and descents where no other options exist, replacement of all existing bolts should continue, and new route development continue in line with the established nature of the specific area managed by climbing advocacy groups in partnership with the local park administration. Removal of any existing bolts should be prohibited as they are essential for safety, maintenance, and preserving the history of American climbing.

Sincerely,
Christopher John