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Comments: I strongly support fixed-bolted anchors and rappel stations. Removing or disabling safety features such as fixed anchors and rappel stations makes climbing less safe and pushes climbers to use trees, boulders, and other natural features that are more likely to be damaged in the long term.

I agree with the Access Fund and American Alpine Club's views on this topic especially as it relates to the need for fixed anchors and rappel stations for safety. Removal of these systems increases barriers to safe exploration of wilderness areas, and the blanket removal or disallowance of anchors without a Minimum Requirements Analysis interferes with a system of authorizing and managing anchors that's functioned for decades.

Safety is my primary concern. Climbers need to trust that anchors are present and safe before starting an ascent. While there are a variety of opinions about whether fixed anchors and bolting for safety is appropriate within the rock climbing community, the overwhelming majority highly value their reliability, safety, and utility. Many routes are difficult to descend without fixed anchors. Similarly, many routes would be unsafe to ascend without fixed anchors. Forcing a review process to allow these safety mechanisms to exist and be maintained where we already know they are necessary is irresponsible. I suggest that the National Park Service engage with national climbing advocacy organizations such as the Access Fund and American Alpine Club to develop a practical review process for existing and new anchors. These organizations represent American climbers while strongly advocating for minimizing the impact climbers have on natural areas.

Additionally, when anchors are removed or not maintained, climbers avoid those routes making them dirtier, more difficult, and even less safe to climb. Such conditions are not always obvious. I have experienced the loss of routes at the Mohonk Preserve in upstate New York, where pitons were used for the first ascents. The pitons were not maintained, and the routes are unprotectable even with modern gear. The result is that the route is still there, but with significantly greater risk. Given that fixed anchors and rappel stations are well-established tools for creating safe climbing routes, the same will happen if they are removed.

Finally, if fixed anchors and rappel stations are removed or not allowed, climbers will rely on trees, boulders, and other natural features to continue to climb. These methods have greater impacts on the environment than fixed anchors and rappel stations and are less reliable and less safe. Tree anchors are often made with nylon webbing or cord rather than steel. The nylon degrades with weathering, where degradation is not always visible, creating a dangerous situation. Steel is safer, degrading in visible ways. The soil around trees that are used for anchors can become compacted, reducing water and nutrients to the roots, and the bark can become damaged. Trees used as anchors often die. Bolted anchors avoid these issues, by keeping climbers off the soil or from reaching the top of a cliff, where plants, trees, and soil compaction happens.

Again, I strongly agree with the Access Fund and American Alpine Club's views on this topic and feel that the proposed regulation of anchors and rappel stations will adversely affect access, safety, and the environment. I believe a more thoughtful solution is needed that includes collaboration with national climbing advocacy organizations to establish best practices area by area to keep existing and new climbing areas accessible, safe, and sustainable.