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Comments: This comment is a response to ??the draft Reference Manual 41 regarding fixed anchors in wilderness areas.

I hope that sharing my experience will provide the USFS with a distinct profile of one climber and a better understanding of who will be most affected by the changes proposed in this manual.

I am a resident of Estes Park, Colorado and grew up only 45 minutes from the east gates of Rocky Mountain National Park. I have been a climber since I was a child, and have had an interest in exploring unclimbed walls and peaks my entire life - my love for wilderness areas has been fostered through a lifetime of exploration in the parks and mountains along Colorado's front range. When I graduated with my degree in Construction Management from CSU, I moved to Estes Park. One of my dreams is to explore the remote and unclimbed mountains near my home.

Over the last 6 years, I've enjoyed climbing hundreds of routes within the park and in the surrounding wilderness areas - some of which are internationally renowned climbs, and others which have seen only a handful of ascents over many generations. My favorite climbing experiences are always first-ascents - starting on the ground with a pair of binoculars and searching for "the line" of features that will yield an enjoyable climb up a feature that hasn't been climbed before. I particularly seek these adventures on formations that are long distances from the nearest trailhead. For example I spent nearly 3 years establishing a climb on Mt. Alice, tucked nearly 12 miles into Wild Basin in RMNP, to establish a route we named "The Mad Hatter".

The Mad Hatter follows portions of a line that was originally climbed using aid-tactics (pounding pitons into cracks, then climbing ladders to ascend the wall) in the late 70's. When my partner and I began climbing on this wall, we discovered many old relics still in the cracks and on the ledges. Pins, slings, and other types of fixed anchors that had been used to ascend the wall nearly 45 years ago. As we climbed, we evaluated the impact of these old fixtures that were now too worn and dangerous to be used for retreat. We discussed at length how we could leave the wall better than we had found it, and what impact we were leaving during our ascent. We felt a responsibility to limit the number of fixtures on the wall, while ensuring that future climbers could ascend our route safely and have the option to retreat if bad weather or an emergency arose.

After much discussion with members of the climbing ranger staff, climbers in the local community and non-climbers who enjoy the remote areas of the park, we came to the conclusion that bolts would be an appropriate upgrade on this route and that the highest-quality hardware was of vital importance. We opted to use stainless-steel five-piece sleeve anchors which have a lifespan of more than a century and can be easily maintained. In accordance with Directors Order 41, we wanted to be thoughtful in our use of bolts so as to avoid "unacceptable impacts to wilderness resources or character, or interfere significantly with the experience of other park visitors." In my experience climbing in wilderness areas for over 15 years, I have been very impressed with the thoughtfulness and care that first-ascensionists bring to these wild places. As a first-ascensionist who has spent many hours hammering on a hand-drill for a new hole, I can assure that it is always my goal to climb a route with the minimal use of bolts on wilderness land from both a time and cost-efficiency perspective. I am of the belief that the bolts we installed on Mt. Alice will provide a safe user experience that may also help to disburse users and provide some relief to higher-use areas of the park. By installing hardware that meets the "gold-standard", these anchors will serve their purpose for many generations without the need for further NPS resources to maintain.

The rules and policies regarding motorized drills in wilderness have been clear, and have served as an excellent

safeguard to minimize the number of bolts installed in RMNP and USFS wilderness areas thus far. As I read the proposals outlined in the Reference Manual 41, I am concerned that there is a significant lack of understanding of how climbers use fixed anchors, and how these new rules will affect future climbing endeavors in RMNP - a historically significant place for wilderness climbing in the United States. While I agree that limitations on the number and type of fixed anchors in wilderness areas is important, it is also clear that there is much more nuance to how and when anchors are used in the park than this reference manual acknowledges.

My hope is that the USFS will reconsider the implementation of this sweeping mandate in exchange for a more nuanced approach which considers the specifics of each individual park. I would like to continue approaching new climbs in RMNP with the confidence that I can safely ascend and descend the wall without worrying that I may be in legal trouble for leaving behind an appropriate anchor to get down safely. I would like to continue to upgrade unsightly anchors that pose a danger to future climbers with hardware that will last for generations while obeying the existing laws against motorized equipment. I fear that my plans for future climbs which respect the wilderness ethic and history of climbing in the park will be denied outright because of this new interpretation of what qualifies as an "installation". I am hopeful that the USFS will be open to having dialog with climbers and first-ascensionists to find a way forward on this issue which is both transparent and thoroughly considered.

Respectfully,

Josh Bender