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Organization:

Title:

Comments: Hello,

My name is Tristan, and I am a climber of 5 years who has climbed in many of the places that would be affected by the new proposed regulations. I oppose the proposed changes for a number of reasons:

1. I believe climbing in wilderness areas is already in line with Director's Order 41. While I agree that "the combined impact of many fixed anchors in a single area or rock wall can have a significant effect on wilderness character", I do not believe that this is occurring in wilderness areas. Clean climbing is the norm in wilderness areas. Bolts are uncommon and placed only where necessary. I don't believe that "bolt-intensive face climbs" exist in wilderness areas. I can speak directly to this in Yosemite National Park, Joshua Tree National Park, and areas in the high sierra. In those places, bolts are only placed where natural gear is not possible, and placed with a hand drill. Fixed anchors are already only placed when the absence of one would be dangerous to climbers. For example, fixed anchors for the purpose of rappelling allow for retreat in case of an emergency. They allow for retreat when the alternative would be a dangerous descent off of the back of a cliff. Fixed anchors also reduce congestion on popular climbs which helps keep climbers safe and moving efficiently.

2. Adding significant friction in the form of requiring an MRA to the process of replacing fixed anchors will actively impede climber safety. If an anchor is unsafe on a popular climb, it should be replaced as soon as possible, and should not need an MRA. Climbers have historically been responsible for self regulating fixed anchors, and doing so in a responsible way that is in line with local ethics. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

3. I disagree that bolts or fixed anchors count as installations or "anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness." While they are left behind after installation, they are not left unattended. The climbing community as a whole takes responsibility for the upkeep and continual monitoring of them.

Climbers have long worked with the parks service and as a community to make climbing as safe as possible, and as low impact as possible. There is a long history of responsible use of wilderness land by climbers. I personally have had some of the most fulfilling experiences while climbing in wilderness areas. I have experienced "an activity that connects people with the land, builds self-reliance, presents challenge, and requires skill". I believe these new regulations would be harmful to future climbers and impact their ability to have the same experience that I did.

Thank you for your time.