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Comments: Matthew Bernstein's Public Comment on Draft Ref M41 on Fixed Climbing Anchors

Greetings and thankyou for considering my public comment on the proposed policy for fixed climbing anchors in NPS and USFS wilderness zones.

A little about myself: I've worked in 3 different climbing management programs:

Bishop Climbing Rangers: Worked with USFS, BLM, LA Water and Power, Bishop Paiute Tribe, Bishop Climbers Coalition and Bishop Chamber of Commerce on how to sustainably manage the influx of climbers that visit the Eastern Sierra.

Joshua Tree National Park: Volunteering for the NPS as a Climber Steward for the winter of 2023/24

Yosemite National Park: A Climber Steward for 6 months in 2019, and a Climbing Ranger during the 2021-2023 seasons and am returning this year for a 4th season as a Climbing Ranger. I've also worked in Yosemite's EMS program and with Wildland Fire as an EMT.

I agree with the notion in the draft that "the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation." I also agree with the notion that climbing is a legitimate recreational activity for experiencing wilderness areas and fixed anchors are often necessary for that activity to take place safely.

After reading through the draft on fixed anchors, I have the following observations and suggestions based on my work experience with the agencies listed above:

Issues with proposed Draft:

Based on experiences in Joshua Tree and Yosemite Climbing Management programs, I believe the proposal on MRA based permitting for installing and replacing fixed anchors to be impractical, unrealistic, and even harmful to the aim of both programs' core mission, which is the protection of visitors and resources. Take Joshua Tree National Park (JTNP) for example: This park currently has the most similar system for permitting that is being proposed in the draft, except that permits are needed for fixed anchors in front country areas as well as wilderness areas. What that process currently looks like is that a climber submits a permit for proposed installation or replacement. That permit then goes to the park's sole Climbing Ranger Bernadette. Bernadette submits the permit to Jean, who works with permitting in the park. Jean sends the permit to the Resources division, who checks to see if the proposed climbing area has any potential conflicts with sensitive vegetation, fauna, or archeological sites. The Resources leg of the process takes the longest, as it often involves people getting out into the field to review potential conflicts with flora, fauna, and archeological sites. Once they make a decision on potential conflicts and mitigations, it then makes it to the Superintendent, who reviews the permit and then sends it back to Jean from permitting and Bernadette. The minimum for a permit to be reviewed under this MRA process is about 2 months if there are no conflicts, but permits can be in limbo for well over a year if there are conflicts.

As you can imagine, this process is not timely and is wildly inefficient for public use. The MRA process may be more appropriate for approving wilderness installations at the administrative level, but when a process that is this time-intensive is used for public permitting, it limits the utility of said permits to local visitors, as they are the only ones that would be near a park long enough for a permit to make it through this process, while visiting climbers will have been long gone. If there is a permit in review for the replacement of a fixed anchor, this presents a Visitor and Resource Protection (VRP) conundrum for the park: The park now has explicit knowledge of an unsafe anchor, but could take months or years to approve or disapprove its replacement. The park now must

decide on a subjective case by case basis: Does this warrant notifying the public? What is our responsibility to do so? How will we notify them in an effective way? Will notifying the public of these "in limbo permits" create frustrations with the park's lack of efficiency and therefore cause distrust and a loss of public buy-in to our VRP oriented programs such as climbing management? Do we notify the public if and when the anchor gets replaced? How will we know once the anchor is replaced?

Not only is the MRA process inefficient for public use, it also takes valuable VRP resources out of the field, where rangers can have valuable educational moments geared towards preventative search and rescue and resource protection. VRP rangers then spend more time in an office, leading to a lack of field presence, where those resources are arguably quite a bit more valuable.

One other issue I found in the draft policy is that it puts too much discretion in the hands of park superintendents. This is problematic, for multiple reasons: Superintendents may not be versed in climbing, its history in their respective parks, the nuances of the different types of fixed anchors and their appropriateness based on the specific rock type and environment, and the day to day priorities of their park's climbing management team (if their park has one).

The last issue that I'd like to point out is that even parks with climbing management teams may not necessarily have a climbing ranger that is an expert in bolting. I'll elaborate more on this in my proposed solutions below.

#### Recommend Solutions:

My suggestion: Allow parks with significant climbing opportunities to manage fixed anchors by creating their own climbing management plans. Do away with any proposed national level MRA-based process entirely. Fixed anchors are better managed at a park level, as each park has its own unique climbing history, climbing management resources (or lack thereof), and sensitive resource issues. Parks that develop their own climbing management plans can then have a section on bolting that takes into account their parks unique qualities and resources.

When creating a climbing management plan, climbing managers can collaborate with climbing management in other parks, their park's superintendent, and their greater wilderness and VRP teams to come up with something that makes sense according to that park's unique setting and resources. The America Safe Climbing Association (ASCA) should also be brought into the conversation during the creation of climbing management plans, as they have a wealth of knowledge on the installation and replacement of fixed anchors and are often the ones providing park visitors/users with safe rebolting equipment. The ASCA are greater experts on the ins and outs of bolting & rebolting than Climbing Rangers and Superintendents, and should be considered an ally in creating anything fixed anchor specific in climbing management plans.

In conclusion, although I agree in principle with the spirit of the draft proposal in the sense that fixed anchors should be used sparingly and only when necessary in wilderness, I do not agree with the MRA process as the right way of achieving this goal from a VRP standpoint. I am a proponent of a park specific climbing management plan approach as a more efficient and pragmatic way of managing fixed anchors in our NPS and USFS wilderness areas.

Thank you so much for your consideration of public feedback in this process.