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First name: Jackson

Last name: Eiland

Organization:

Title:

Comments: I stand with the ASCA, the Access Fund, the American Alpine Club, and all of the other stewards and representatives of rock climbing - insofar as I oppose the proposed changes to how climbing anchors are managed and maintained in our wilderness areas.

We advocate for legal placement of hand-drilled anchors and protection bolts, placed sparingly and with respect for the rock and the environment, on ground-up ascents in the wilderness. Replacement of existing fixed anchors should not be restricted in any way. We are against the requirements for permits for new routes. However, if a permit for a new route must be issued in certain rare and sensitive areas, it cannot require an exact fixed hardware count because this information is impossible to know in advance.

The new policies would classify fixed anchors as "prohibited installations" in Wilderness areas. This new classification would apply to both new and existing anchors. This would threaten the existence of fixed protection on routes that have been enjoyed by climbers for decades and obstruct climbers' ability to replace bolts when they become unsafe.

This creates not only safety concerns but will also lead to resource degradation as more climbers seek out natural features like trees for anchoring in the absence of reliable anchors that are typically placed well away from vegetation features in clean sections of rock.

The ASCA does not oppose guidance on fixed anchor placement in wilderness areas, but these NPS and FS directives are unreasonable. They are unenforceable, will create more problems than they solve, and will deeply impact safety for climbers and accelerate impacts on wilderness resources, not reduce them.