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Comments:

Fixed anchors are an essential part of a climbers' safety system and are necessary for recreational climbing in Wilderness Areas. They are to climbers what trail signs and bridges are to hikers, with less impact than a typical hiking trail.

Historically, for decades, bolts were allowed by land managers in USFS Wilderness. They were never, until very recently, defined as prohibited "installations" under the Wilderness Act.

If no significant resource degradation can be identified, existing fixed anchors should be allowed without a time consuming bolt-by-bolt MRA.

The language of the new proposed guidelines is both ambiguous and anti-climber at the same time. It would, in effect, curtail future exploration and first ascents in American Wilderness, disallowing climbers the right to decide when and where to utilize fixed anchors, based on their need for safety while exploring or establishing a new route.

Director's Order 41 §7.2 affirms that "climbing is a legitimate and appropriate use of wilderness" and that "the occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act," but also states that "the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation."

I don't believe this last statement to be true. Incompatible? Climbing a steep bolt protected face climb is one of the greatest joys in rock climbing, and some of the the most classic, spectacular, exhilarating, and aesthetic face climbs exist in pristine Wilderness. The pristine location and Wilderness surroundings of the climb are what make it even more special. Why the change in management policy after over half a century of historic precedent and existence of these bolt protected face climbs in American Wilderness?

Just because a climb has bolts does not automatically mean there will be more people climbing it than a trad climb, or that it will have any greater impact to resource degradation than a nearby classic crack climb or trad route.

And what defines "bolt intensive"? Are 4 bolts in 100 feet OK, but 6 bolts in a hundred feet too many? Who decides? Every land manager may take a different approach, some more stringent than others.

Directors Order #41 also assumes that a "bolt-intensive face climb" creates more resource degradation than a trad climb. This is not necessarily the case.

The impact of a "bolt intensive face climb" is no greater or more visually obtrusive than a well-established trail with trail signs. On most Wilderness climbs, bolts are difficult to see and find by climbers on the route looking for them, let alone by non-climbers hiking below the cliff.

Fixed anchor management should include a permit system that allows for quick replacement of existing fixed anchors with stainless steel, camouflaged hardware that will not leave rust streaks and be painted before

placement to match the rock's color, thus making the hardware virtually invisible to non-climbers, and hard to spot from even the base of the cliff.

"Emergency replacement" should also be allowed, for example, when a climbing team on a remote Wilderness big wall climb comes across a rusting, corroded 1/4-inch bolt in dire need of replacement, or encounters a bolt that has been sheered-off by rockfall.

Existing routes with bolts that have been allowed up to now by current management practices should not be removed, even if they are "bolt intensive," but going forward, a permit system for new routes could limit over bolting and overly "bolt-intensive" routes.

Regarding a permit system for new routes: Should the USFS be responsible for the safety of climbers by dictating exactly how many bolts a climber is allowed to use to make a particular route safe? In a permit system implemented for new routes in Wilderness, what will define "bolt-intensive?" How many bolts per pitch make a climb "bolt intensive?"

Difficult to navigate permit systems and draconian bolt allowances will only encourage non-compliance, and enforcement will be challenging to say the least. Does the USFS really want to devote their resources to becoming the bolt police?

Imposing difficult to navigate obstacles for the maintenance and replacement of aging fixed anchors will also foster animosity and non-compliance.

Land managers should work together with local climbers and climbing groups to develop and implement workable and expeditious permit systems for replacement of existing fixed anchors and for new bolted routes.

As a professional climbing guide, safety for myself and my clients is my top priority, and the ability to maintain and replace fixed anchors in Wilderness is of utmost importance to safely climb in Wilderness.

By banning existing "bolt-intensive" routes that do not meet the new definition of an acceptable climb in Wilderness (and therefore not allowing for the bolts to be replaced and maintained when necessary), the USFS is proposing to erase the great history and tradition of face climbs in Wilderness. With the new USFS proposal, historically significant and important climbs that have existed for decades (including some of the most classic and famous routes in America) will be allowed to age-out, becoming both a safety and liability issue. If the bolts are removed by the USFS, this will foster non-compliance and "bolt wars."

I've been climbing for many decades. Some of the greatest climbing experiences in my life have been climbing first ascents in USFS Wilderness, climbing from the ground up, finding the path of least resistance, placing occasional bolts along the way. Without fixed anchors, it wouldn't have been possible to safely climb these routes. Will future generations have the freedom to pioneer a new route like this? Based on the new proposals, I'm not sure.

There is a precedent for fixed anchors in American Wilderness. They have been allowed for decades, and are an integral part of safely climbing in Wilderness. Without them, future generations will not be able to safely climb and explore in American Wilderness.