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Comments: To whom it may concern,

I am writing in regard to the NPS and USFS draft procedures regarding fixed anchors and fixed equipment in National Parks and Wilderness Areas. While I understand the "Forever Wild" ethic that seeks to limit the alterations made to natural spaces and objects, particularly in our most treasured national lands, and while I am no proponent of excessive bolting (especially where traditional protection is available) a prohibition on bolting and fixed anchors and of a cumbersome procedure to regulate the replacement of those anchors will have significant negative effects on the climbing community while not adding much positive value to the enjoyment of these places by non-climbers. Quite simply, because of the size and visibility of bolts and bolted anchors, most bolts will be invisible to passers-by. The safety of the climbing community, however, will undoubtedly suffer, as even though the new regulations allow for a procedure to allow for the replacement of bolted anchors, the difficulty of petitioning for and adjudging whether anchors are worthy of replacement on a case-by-case basis will cause significant delays in the process and will likely lead to unsafe anchors being left on cliffs in some of the most important positions on climbs. In other words, one of two results--neither of which seems satisfactory given the Park Service's existing policies--will occur: either climbers' safety will be lessened on many routes throughout the country, or the amount of climbing will simply decrease, especially on routes that do not have properly updated fixed protection.

We may also therefore see two other consequences that will cause far more destruction to the natural environment than the placement of a few small bolts: (1) climbers may leave behind their own protection when having to bail off routes where fixed anchors haven't been adequately replaced, resulting in far less appealing (and again, far less safe) repositories of gear in the middle of many climbing routes and (2) with fewer safe routes available for climbers, more climbers will be pushed onto relatively fewer routes, resulting in more destruction at certain crags and wilderness areas and in lesser enjoyment for climbers of those natural areas as they experience greater crowds. This second point is especially true given the growing popularity of climbing in the United States.

Finally, a prohibition on bolting, and especially on bolt-protected face routes, as suggested by Director's Order 41 §7.2, will result in unequal access to climbing, particularly for groups that are traditionally underrepresented in the climbing community. A decrease in the number of bolt-protected sport routes will make it significantly harder for many climbers to engage in the sport if they cannot afford traditional protection. A single rack of Black Diamond Cams (C4 #0.3 to #4 and Z4 #0 to #0.2) and stoppers #4 to #13, the minimum required for traditional climbing today, costs \$1114.40, while a sport-climbing rack; (a rope and twelve quickdraws) costs approximately \$425. In addition to the expenses of acquiring gear, moreover, learning to trad climb requires either friends with expertise in the sport or costly lessons to learn how to place and use gear effectively.

While climbing is undoubtedly an expensive sport, these price differences are substantial, and lower income communities, which we all know tend to be made up of minority groups that have been traditionally oppressed and underrepresented in American history and in the climbing community, will likely have a harder time affording these new costs necessary to fully engage in climbing. Those same communities are also less likely for these systemic reasons to have the kinds of mentors who can help teach others how to climb using traditional protection.

Although these potential consequences for diversity in climbing may be distantly removed from the proposed policy, the history of this country suggests that we should avoid at all reasonable costs any actions that only serve to deepen the divide between white Americans and Americans of color. The climbing community,

recognizing the historic lack of diversity in the sport, has been working hard to remediate those discrepancies and to make climbing more widely available to Americans regardless of background. I therefore implore you to reconsidered the proposed regulation, not just because of the safety concerns it creates, but also because of potential impacts on the wilderness and on the accessibility of climbing for people from various different backgrounds.

Sincerely,

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