

Data Submitted (UTC 11): 1/30/2024 5:27:52 PM

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Comments: While I applaud your endeavor to provide guidance about climbing management on Federal lands, I have a number of concerns about the Proposed Climbing Directive regarding fixed climbing anchors (henceforth, "bolts").

Rock climbing is a historically important form of American wilderness recreation, and rock climbers have been instrumental in helping to protect and conserve wilderness lands. Climbing bolts are essential for safety in many situations, and their usage and installation is already subject to management under climbing community standards as well as Federal rules (such as no use of power drills in National Parks).

The Proposed Climbing Directive proposes a complex and piecemeal regulation process for bolts, in which bolted routes (or possibly individual bolts on routes) would be subject to a Minimum Requirements Analysis (MRA) review as part of an application for bolt permits. The MRA process, as proposed in the Proposed Climbing Directive, is unreasonable for a number of reasons:

- Since climbing management plans, and MRA reviews, are left up to the individual Park units or Wilderness managers, this allows for an inconsistent patchwork of different rules and standards across various public lands. This means that climbers would potentially have to research new rules for every area they visit, even if the areas are nearby in the same state.

- Given historical funding deficits among the NPS and USFS, and given the different funding priorities and management projects in different areas, it seems highly likely that climbing management plans will be deficient or nonexistent in a number of Federal lands, as is currently the case. It also seems likely that MRAs will not be processed in a timely manner or not be processed at all, depending on which Federal area is asked to perform the MRA. I do not see any reference in the Proposed Climbing Directive to mandating funding for the MRA process or employing dedicated "climbing" managers on Federal lands. How will this work be done without dedicated resources?

- Requiring a complex MRA before old and potentially dangerous bolts could be replaced (this type of action is commonly performed by nonprofits such as the American Safe Climbing Association (ASCA), who ensure high quality stainless steel hardware replaces old, rusty, unsafe bolts) is a risk to climber safety, especially given the above concerns about whether MRAs will be done in a timely manner or at all.

- Many terms in the Proposed Climbing Directive, such as evaluation of "climbing opportunities" for reviews of new climbing development, are vague and subjective. Without a guarantee of funding for climbing management, and given that land managers may lack the expertise or community input needed to accurately evaluate climbing areas and route development, it seems likely that the ambiguity in the Directive will lead to subjective decisions by land managers, especially in ways that are at odds with the goals of the climbing community itself.

Federal land managers have authorized and managed climbing bolts for decades. While it is certainly true that more people than ever are climbing and that some additional management may be necessary now or in the future, I think that the Proposed Climbing Directive is going down the wrong path.

I have been an outdoor recreationist since I was a child, and began rock climbing as a young teenager. While some climbing areas have significant development of trails, staircases, and belay platforms, actual climbing bolts - absent an actual climber on the rock - are mostly invisible to the untrained eye and do not themselves constitute the seeming threat to wilderness character that the Proposed Climbing Directive posits.

I also have climbed in a number of historically popular areas that saw bolting development in the 1960s and 70s, and it is frightening to have to trust your life to old, rusty, loose bolts from that era. In recent years, the ASCA has been doing great work to modernize and replace those bolts, which sometimes requires drilling new holes if an old bolt cannot be removed or the rock under the old bolt is compromised. It is impossible to know in advance what specific steps will be needed to replace dangerous old bolts, and adding levels of complexity and bureaucracy will just mean that bolts are replaced less frequently, or potentially not at all. This would make climbing less safe.

There are many famous and historically important climbing areas on Federally managed lands. It would be a huge impact to climbing if a damaged bolt couldn't be replaced on a famous route due to delayed or unprocessed MRAs. Without more stringent requirements for climbing management plans and MRA timeliness, it's possible that famous climbing areas would become unusable due to decrepitude if dangerous bolts get removed and can't be replaced. Any climbing guidance also needs to ensure continuing protection of climbing access and preclude individual Federal lands from deciding to outright ban bolts or ban any updates or further development. (Note that this could be accomplished simply by the land managers declining to publish a climbing management plan or process any MRAs.) And while the Proposed Climbing Directive stipulates that "existing" bolts can be used, it also needs to be clear that land managers can't declare bolts prohibited and remove the existing ones from Federally managed areas.

Some of the seemingly urgent concerns in the Proposed Climbing Directive are already addressed by current practices. Native American cultural areas are already protected and climbing in such areas is either managed or prohibited. (See Hueco Tanks, TX for an example.) Environmental considerations are already taken into account, such as with seasonal bird nesting closures in some climbing areas. Power drills are already prohibited in National Parks. While there are clearly many impacts we do need to manage better, climbing management has a long, rich history of climbers working with land managers. We need more cooperation, not complex bureaucracy, permits, or prohibitions.

Legislation to enact more comprehensive Federal climbing management plans (the EXPLORE Act) is currently working its way through Congress. I believe the piecemeal methodology outlined in the Proposed Climbing Directive will place climbing at risk in many Federally managed areas. While I would welcome improvements to the Proposed Climbing Directive that enshrine continuing access, allow for safety improvements without a lengthy administrative process, and prioritize cooperation over bureaucracy, I fear that even these improvements would not be sufficient without a more holistic and over-arching management plan that would apply to all Federally managed climbing areas. I recommend the USFS take time to revise its climbing management goals in light of the considerations I've noted above while the legislative process is allowed to take its course.