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Comments: I am writing to express concerns with the proposed amendment on climbing activities. I believe there are a number of aspects of this policy that will be burdensome and confusing to implement while not addressing other issues that are far more impactful to the wilderness experience.

It is stated that while existing fixed anchors may continue to be used, managers should evaluate all routes with existing fixed anchors as funding and resources allow - this seems like a directive that is very unlikely to be adequately funded or completed within a reasonable amount of time. Also, the idea that a climber might encounter a bolt or fixed anchor of questionable safety but not replace it because they have not yet gone through the MRA process poses a safety risk to all other climbers that may follow or climb the route while the MRA process is being pursued. Not all climbers have the knowledge to evaluate the safety of a fixed anchor and may assume that it has been inspected and vetted by the park service as a result of this new policy, when in reality it is hung up in red tape.

I have been climbing for over 20 years and also experience backcountry and wilderness areas through other means such as hiking, trail running, and backpacking. Fixed anchors such as bolts or rappel stations on climbs have such a negligible impact on the wilderness experience of other users, this seems like a disproportionate response to so narrowly focus on climbing anchors. There are many other far more impactful activities such as gear stashing, leaving fixed ropes on climbs, hikers cutting switchbacks, trash on trails, camping on sensitive surfaces, crossing barriers and trampling vegetation, unpermitted backcountry camping, improper disposal of human waste, etc. that the park service could focus on rather than the presence of bolts hundreds of feet off the ground that only climbers will encounter.

I would propose a more collaborative and less bureaucratic process whereby land managers meet with local and national climbing advocacy groups such as the Access Fund and American Alpine Club to instead outline park-specific guidance and best practices on the placement and use of fixed anchors that could be followed by the climbing community. These guidance documents could reinforce the historical ethics of fixed protection in a given area and lay out best practices for selecting locations for and placing bolts, expectations for fixed anchor management and replacement, suggestions for carrying extra cord or webbing to replace degraded rappelling stations, and a mechanism to report unsafe bolts or fixed anchors to a local organization or the American Safe Climbing Association for replacement. This approach would likely achieve much of the desired outcome of the proposed directive without introducing confusion and endless bureaucratic red tape.

Finally, while I recognize the explosion in popularity of climbing and the need to mitigate adverse impacts, this policy appears to be attempting to solve a problem that isn't really a problem. I would instead suggest that limited park resources focus on outreach, engagement, and education around best practices and limited impact recreation rather than instituting confusing, unfunded bureaucratic red tape and mandates that will ultimately unfairly restrict access to a certain subset of recreational users.