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Comments: As a backcountry camper, climber, hunter, fisherman, and Eagle Scout I am strongly against the proposed rule change.

Here are some things I find problematic with the proposal.

"Parks should evaluate all routes with existing fixed anchors when practicable, as funding and resources allow, through either a park, area, or route specific MRA."

Evaluating all fixed anchors will be a herculean task that will never be adequately completed. Bolts are small and easy to miss, and guidebooks, both digital and physical, can never be relied upon to be completely accurate.

Furthermore, the proposal itself acknowledges that task would be done "when practicable" which it will almost never be.

How will the NPS ensure that the persons making these evaluations understand the nuanced situations involved in rock climbing?

"On routes that have not yet been evaluated, climbers may make emergency replacements of pre-existing fixed anchors if necessary to exit the climb in the safest and most expeditious manner possible."

On routes that have been evaluated will the NPS bar climbers from placing life saving equipment in case of an emergency? What is the difference between evaluated and unevaluated routes in this respect? How is the NPS going to determine what is the safest and most expeditious manner?

"Step 1 should discuss how climbing fulfills park and wilderness recreational purposes and furthers wilderness values."

Climbing has already been determined to be a legitimate use of wilderness. It does not need any more justification than hiking or camping.

"If appropriate, parks should consider what climbing opportunities exist outside of wilderness and whether those are sufficient to realize the recreational objectives of the park or whether some type of climbing in wilderness is necessary to fully realize the purposes of the wilderness area."

This could be easily interpreted to mean that climbing, which is already recognized as a legitimate use of Wilderness, could be denied by NPS management if an area manager decides there is enough opportunity outside of their jurisdiction. I find the thought of NPS management determining how much recreation opportunity is 'enough' to be abhorrent. Especially when these decisions are based on what is outside their jurisdiction.

"The analysis should be guided by the broad policy direction in Director's Order 41 that "fixed anchors or fixed equipment should be rare" and that "clean climbing" techniques should be the norm in wilderness."

"Rare" is a subjective term. Subjective terms make policies and rules unclear, arbitrary, and inconsistent.

Subjective terms make for poor policy.

Sometimes bolts are the best practice for "clean climbing." The environment at the tops of cliffs is extremely sensitive due to a wide range of factors. Bolted anchors allow climbers to rappel a route and avoid the damage to sensitive trees, vegetation, and soil in this delicate environment that are associated with building belays in these areas and walk offs.

"Director's Order 41 also states that occasional fixed anchor use "does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act,""

This is correct. Bolts and anchors are small and difficult to notice, especially from a distance. Additionally they're placed in areas where the non-climbing public doesn't go.

"but that "the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management.""

What is the definition of "bolt intensive" It is another arbitrary term that will only add confusion to further policy making. Sometimes bolts are the only way to protect climbs. The NPS forcing climbers to eliminate bolts or space them out to arbitrarily long spacings endangers climbers and opens the NPS to liability, regardless of how many signs are posted at trailheads.

Furthermore, the concerns regarding the "concentrations of human activity" supported by bolted climbs are no different than those of climbs without bolts. Look at the Mohonk Preserve in NY as an example. There is a strong traditional ethic there, zero sport climbs, zero "bolt-intensive" climbs, and it is still considered a premier location on the East Coast.

"Installation of fixed anchors by NPS personnel for administrative and/or operational purposes (e.g., search and rescue, research, trail projects) is also subject to NPS policies and protocols regarding the MRA process." Particularly troubling in this segment is the mention of search and rescue following the MRA process to use a fixed anchor. Is it really expected for S&R to file paperwork to do their job while a stranded hiker, climber, or other such person lays injured and inaccessible in the wilderness?

Ask someone how many climbing bolts they have hiked past. It would be extremely rare for any non climber to notice bolts or fixed anchors. Climbing usually happens away from the standard trails frequented by the public at large. Generally speaking, one would need to go looking for them to find them.

Will the NPS send managers out to investigate routes for approval? If not, then they will be relying on the climber that want to add them to be honest and accurate in their need. If we are trusting climbers in this, then how is that any different from what climbers are already doing? The climbing community is already balancing the need for fixed anchors or not throughout the country. While we may have some disagreements on the subject, we do reach equilibrium on the subject.

I also have serious questions about the permitting process. I've noticed ice screws listed on the permit application. In what world are they permanent. Not only are climbers loath to leave behind their expensive equipment, the ice itself isn't permanent so how can the screw be?

How will the NPS enforce any of this? Will rangers be shaking down anyone that looks like a climber, counting lengths of rope, cams and nuts? Incidentally cams and nuts, the stars of "clean climbing" can also be turned into "fixed-anchors" sometimes accidentally. Rangers performing searches of ice climbers bags to count screws is ludicrous, and possibly illegal. Lets not forget that the application also has information of route and descent descriptions. Will climbers be ticketed for altering plans due to changing conditions in demanding and dynamic mountain terrain?

Overall this proposal seems at best inefficient, and at its worst, dangerous. It truly seems to have been put together by those that do not have a sufficient grasp of the subject at hand. I urge the NPS not to move forward with the proposal.