

Data Submitted (UTC 11): 1/30/2024 9:18:35 PM

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Comments: To all concerned parties,

Thank you for addressing an exploding bolting problem which has occurred in many US climbing areas, both wilderness and non-wilderness. But as we know, so many of these climbing areas fall under the domain of public lands.

A little history: While we older climbers from the 70's and 80's have long been accustomed to a certain ethos in doing business, if you will, in the out of doors, I would say that an established etiquette is no longer accepted as *de rigeur*. Which is to say, that once upon a time there was a very strong culture within the community as to how things were done. Sometimes it was a slow evolution. Naturally, as in any population, there were always a few outliers. But, in the main, there was a predominant ethos. I don't believe that ethos exists any longer.

Populations have changed too.

From 1990, US population sprung from 248 million to well over 341 million in 2024, a jump of nearly 100 million US residents. And more significantly, outdoor users have exploded, astronomically. According to the Outdoor Industry Association newsletter and surveys: "The estimated number of indoor climbers, for instance, rose to over 5.6 million in 2021?an all-time high and a roughly 7.1% increase from 2019." Granted, many of these indoor climbers are just that, indoor climbers. But the explosion is manifested on the cliffs in the National Parks and on our national lands. Just try to climb on Long's Peak East Face, "the Diamond" on a sunny, bluebird July day and count how crowded the wall is, how many people are on this amazing face. And that is a great thing to be out recreating in America's lands. With that pressure, though, comes the responsibility to manage it.

Culture has also changed, and ever since Covid, I would argue the US culture has seen a dramatic turn towards a "we can do what we want, when we want, and we are entitled to this" attitude. Public lands have been assaulted, mauled, dumped on, and in general trampled. The "untrammelled" intent of the Wilderness Act has been hiked out by mega millions: We came, we saw, we conquered." "Veni, vedi, veci".

As a result of these exploding pressures, I believe that all new bolt placements should in the first order be considered as, yes, installations. And, although the argument is made that under the Wilderness Act bolts are not prohibited installations, they are no matter how you slice the pie, a defacing of a rock face. How is it different than carving your initials in the Sequoia?

Arguments continue that prohibiting fixed anchors will create safety issues. Well, can't we just agree that climbing is an inherently dangerous activity. "Caveat Emptor" If, in an emergency an extemporaneous anchor needs to be established, then well, it happened, and the situation can be dealt with on case by case basis. There can always be emergency situations that arise. A safe extraction, or life saving measure, is vastly different than preparing a route for future enjoyment and for future climbers.

Planning for the future: Climbing anchors, in situ, that is currently existing on public lands, should be mapped and categorized with the assistance of the local climbing community, and rigorous or scarcely protected routes, designated as such, although they are generally denoted as such in local guidebooks. The final decision of climbing them needs to be made by the climbing parties themselves. But a mapping out of at least the major 100 climbs of the area, can be undertaken, and an analysis of bolt health can be determined, and measures taken if they need to be replaced.

If no guidelines from federal agencies exist for bolting, people will continue to make the decisions they feel are

best, without an overall blueprint of how to bolt, what is in excess, what is deemed reasonable and what constitutes a reasonable anchor set up. The practices of bolting in the U.S are at least 20 years behind that of Europe, but climbers continue to repeat the same errors of the last 40 years of bolting. There are some excellent practices out there, largely so, in fact. However, there needs to be a higher standard, a standard established by consent between engineers, climbers and the public land management representatives responsible for administering Wilderness areas and climbing areas on public lands.

It's a volatile subject in the climbing community.

And with this more hardline view of careful analysis of bolting, I am confident I am an outlier of the community's voice. But given that this group is predominantly aged 18 to 45, I suspect mine is a different perspective.

But, after 50 years of active climbing all over Europe and the U.S, there are not a lot of experts out there who have seen more of it. Europe is littered with bolts, but Europe is also overwhelmingly limestone. While sandstone and amazing granite exist, most all limestone faces need bolting to successfully climb in that geologic medium. Thus, many French, Italian, Swiss, Austrian or German Klettergartens are well-bolted. The sense of wilderness is also much different there. Nature exists, but wilderness is further afield there.

If we can prevent the ideation of bolting as a necessity here in the U.S, then we have a slim hope of preserving some sense of the untrammelled aspect of the Wilderness Act here in the U.S.. It's gone too far already, but maybe we have a chance of saving some of it for our grandchildren's grandchildren.

Thank you,

Charles Gray