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Comments: My name is David Johnson, I am a climber, and I work at the California Energy Commission where my job is to develop regulations for energy efficiency. I am hence writing these comments both as a climber and as a regulator. I have the following comments to the draft authorization process for fixed anchors in the wilderness:

Any new regulations should address known, defined problems; not upend decades of unproblematic practices. The proposed authorization process would be a massive disruption to the climbing community and it would likely require an excessive amount of resources to implement well.

There could be significant safety risk if existing fixed anchors (a.k.a. bolts) are removed or if restrictions are put in place for the replacement of existing bolts that are no longer safe. For example, if the bolts at the top a route or the bolts used for rappelling are removed, it will lead to risky situations as the climbers might not be aware of the removal and might not be prepared to safely return to the ground without the bolts/fixed anchors. Similarly, if restrictions are placed on the replacement of bolts, old or damaged bolts might not get replaced as expeditiously as if the current practices are continued. Old or damaged bolts constitute a safety risk, especially for more novice climbers or climbers without the appropriate gear, and old bolts are currently replaced by experienced climbers voluntarily and at their convenience. These regulations should not make replacement of old bolts more difficult or cumbersome.

USFS should ensure that the proposed regulations solve the problem they intend to solve. It appears to me the core problem that has been identified with climbing is not the fixed anchors that are placed on rock faces but the human activity that sometimes is associated with rock climbing areas. Both climbers and non-climbers typically do not notice bolts unless they are actively looking for them. Crowds and large groups of people can be an issue, though, whether it is in a climbing area or in another area of interest. As nature activities get more popular, crowd management is critical to give people a pleasant visiting experience. When an approach is needed to reach an area, it is important that a trail is established to avoid people trampling down untouched nature. Crowd management and trail work can eliminate most of the issues associated with popular climbing areas without changing existing practices regarding fixed anchors. Hence, if USFS wants to address issues with climbing, USFS should be sure to address the real, underlying problem. Interestingly, the proposed regulations do not talk about bouldering, which arguably has comparable impact to sport climbing areas, and less impact than trad climbing areas.

Not all climbing areas are the same, and one should distinguish between sport climbs and trad climbs. In a sport climb, just bolts are used for protection, and they are typically placed 5-10 ft apart. In a trad climb, there are typically no bolts and instead cams or nuts are used for protection. Trad climbs often have fixed anchors at the top though to facilitate safe and convenient lowering. Obviously, a sport climb has significantly more impact on the wilderness than the trad climb. Furthermore, one might not even be able to see the fixed anchors on the top of a trad climb from the ground, and it hence has very little or no impact to the general wilderness experience. If USFS moves forward with regulations on fixed anchors, it is important to distinguish between sport climbs and trad climbs; they are very different. Similarly, it is important to distinguish between single-pitch areas and multi-pitch climbs. If fixed anchors are 500 ft off the ground, the only people who will notice them are the climbers on the route. If non-climbers are bothered by the climbers themselves, that is a different potential problem with different potential solutions. In my experience, non-climbers are generally fascinated by climbers and their climbing gear, however, and I have never encountered anyone being annoyed because my friends and I are going climbing. Let's make sure we are solving the problem that we want to solve.

Instead of the proposed regulations, I suggest a localized and targeted approach with decisive action if a problem associated with a climbing area is identified. In the most extreme circumstances this could involve closing down a specific climbing area while solutions are identified and implemented. It is crucial that these decisions are made after a robust stakeholder process which involves both the climbing community and other affected visitors. Climbers care deeply about nature, the wilderness, and the community around us, and I am confident that climbers would step up and find solutions for any problematic situation. A narrow regulatory approach would be more effective, less resource-intensive, and have fewer unintended consequences.

Let's work together to ensure our wilderness is as beautiful and welcoming as possible.

With gratitude,
David Johnson
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