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Comments: *I read the entire document.* I hope you will in turn read all of my comments. I have some serious concerns about things that I think are overlooked, and things that I think are dangerous for climber safety and climbing preservation in this document.

Concern 1: Using the statement "as time and funding allows" is incredibly dangerous and irresponsible for these following reasons. *And especially when it comes to fixed anchors!*

Most importantly, fixed anchors are essential for climber safety and make climbing possible! In regards to the MRA, there is no way personnel can maintain or assess every fixed anchor in majority of climbing areas, for continued use or installation, *especially* if this occurs only "as time and funding allows." This is life-threatening when it comes to fixed anchors and bolts, and inefficient red tape.

Imposing unreasonable and unnecessary obstacles to the regular maintenance of fixed anchors will create safety issues, and this is a responsibility already undertaken by the climbing community. Impeding that, by saying "as time and funding allows," risks climbers' lives and puts us in danger! It puts my life at risk!

Fixed anchors are an *essential and fundamental* part of climbing. There is a section in the document regarding MRAs that says "Existing fixed anchors and fixed equipment may be retained pending completion of an MRA, as funding and resources allow, to determine whether they are the minimum necessary for administration of the area for Wilderness Act purposes." I'm here to tell you, as a climber, that fixed anchors are *absolutely necessary* for climber safety and for engaging in the activity of climbing. And to add the statement "as time and funding allows" is incredibly irresponsible and unpractical for a life-threatening matter such as pending removal of fixed equipment that climbers depend on for safety and in order to climb! If this document is going to use the phrase "as time and funding allows," you need to include what happens if time and funding *is not present.* Because when has there ever been "as time and funding allows" for overworked and understaffed employees in park service, ranger districts, NSF, etc.? If parks are not receiving any extra funding, time, or manpower for the objectives outlined in this document, why is there not information or plans of actions for when funding or time is not present? That doesn't seem responsible, or compatible with this document's objectives, to have this level of red tape and life-dependent equipment if there is not further discussion about what happens when funding and time is not present. This may cause unreasonable closures on climbing areas as well! Please at minimum consider using existing climbing groups and organizations who are trained and staffed to help with these tasks, and who already keep fixed anchors and bolts maintained and safe for climbers. And please consider the fundamental fact that fixed anchors are *essential.* When is a time when fixed anchors are NOT the minimum necessary for climber safety, descent, and the ability to engage in climbing? Never!

Concern 2: I disagree with the statement "the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation." Here's why and the problem this statement will create: if we are agreeing that "climbing is a legitimate and appropriate use of wilderness," then we need to consider how climbing can be preserved in *all locations* and on *all different types of rock*- because not all rock types allow for climbing (or even safe climbing) without bolted routes! As a climber, I have visited many places where climbing is only possible on the rock because of bolts. American Fork in Utah, which consists of pocketed limestone, and Maple Canyon in Utah, which consists of conglomerate rock, are perfect examples of areas that do not offer natural protection for climbing.

**My concern is that agreeing to the above statement butts bias on the types of rock formations, and thus areas, that climbers are allowed to utilize. There should be not any bias towards different areas of climbing due to the

type of hardware that is necessary to climb the rock.**

I believe this document should take into consideration that some historic and important areas for climbing need bolted routes because of the type of rock that exists in those areas. I do not believe that rock type should hinder whether climbers can continue to use a specific area of wilderness, especially if we have established that climbing *is* an appropriate use of wilderness. There should be not any bias towards different areas of climbing due to the type of hardware that is necessary to climb the rock. Also, this document discusses how climbing can preserve, and is an integral part in many places, qualities of wilderness character. This needs to be taken into account in cases where this is true for many parks, but the rock types need bolted or mixed face climbs due to the nature of the rock.

Concern 3: Document says "fixed anchors should be rare" and that "clean climbing techniques should be the norm" in wilderness. Please regard my comments in Concern #1 on this topic as well. I disagree on this statement of "fixed anchors should be rare" for the following points: 1) Most importantly, fixed anchors are *absolutely necessary* for climbers to safely descend routes, even with clean climbing. Fixed anchors are an essential piece of climber's safety and essential to climbing! In what realistic scenario should they be removed? They are the bare minimum! We cannot climb without them! There are not many areas that allow climbers to walk off the top of a route, and this should be an important consideration when it comes to anchors. Having fixed anchors at the top of routes, regardless of whether the route is sport or traditional climbing, keeps climbers safe and allows them to descend to the ground, making climbing possible! If climbers did not have access to these anchors, there could potentially be many accidents and fatalities due to climbers trying to create their own anchors for safe descent, or hoping that the rock even allows for anchor building for descent (which usually does not). 2) Different types of rock require different types of protection (some rock types and pre-existing routes do not allow for natural protection except bolts). In instances where some climbing routes do require traditional gear and do not have fixed anchors, the rock does not always offer natural sources of safe descent, and often people have created anchors left in place with their own gear that is often suspect and risky to use versus a maintained fixed anchor. 3) Traditional climbing, versus sport climbing on bolts, is not for everyone- it requires much more training, can be much more dangerous, and consists of a heavy financial barrier to entry. I am concerned that this language does not consider that some climbers experience traditional climbing (using nuts and cams on routes that allow for natural protection) as too risky and frightening for themselves, but would still like to participate in outdoor climbing, and can do so by utilizing pre-existing bolted routes if there are various reasons they cannot or will not participate in leading traditional routes. *I fear too this would result in bias towards traditional climbing versus sport climbing on bolts, which is not a byproduct this document should encourage or create.*

Both sport climbing on bolts, and climbing routes with traditional gear, should be preserved if we've agreed that climbing, overall, is legitimate and an appropriate use of wilderness, and if it's been established that climbing can enhance wilderness character in many areas.

Concern 4: When evaluating fixed anchor applications, the lacking character that needs to be addressed is the rock type. As I mentioned in concern 2, there seems to be a bias in this document on "sport" or "bolted" routes versus traditional routes. Many rock types do not allow for traditional climbing, and so there needs to be a better standardized way of evaluating fixed anchor use in an area that does not cause bias in climbing types or accessible climbing areas simply because of the type or nature of the rock. Fixed anchors also need to be considered in light of different climbing areas. Fixed anchors can preserve wilderness areas and rock quality. A good example is sandstone rock, which can be preserved from rope grooves by careful placement of fixed anchors that keep the rope from running over the rock's surface. There was no discussion in the document about how fixed anchors *can* enhance and preserve wilderness character.

Concern 5: Restricting new route establishment is both unenforceable and will create confusion among land managers and climbers. New opportunities should be maintained unless otherwise it's determined in an area that

it would be detrimental (cultural reasons, natural resources, etc.)

Concern 6: Prohibiting fixed anchors has the potential to obstruct appropriate exploration and use of Wilderness areas. Managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary by the very nature of navigating in complex, unpredictable vertical terrain.