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Comments: I'm a traditional and sport climber in my 24th year of climbing, now at age 70. I do not do aid climbing. I climb all over the country, but mostly at the Red River Gorge, KY and in various areas around Chattanooga, TN. I am a member of the Red River Gorge Climbing Coalition, and the Access Fund.

Comments:

1. In 2355.05 Definitions, consider revising the definition for a Fixed Anchor to:

"Climbing equipment such as a bolt or piton that is left in place as fall protection for the ascending lead climber, or left in place to facilitate ascent, descent, or traverse of technical terrain."

The reason for the change is that the vast majority of bolts are placed as fall protection and are not usually used to facilitate ascending a route. Bolts placed to aid ascending a route are rare.

2. In 2355.31(3), change the second sentence to read: "Allow placement and replacement of fixed anchors only for purposes of fall protection, belay, rappel, traverse, resource protection, or aiding in ascent and descent."

The reason for this change is that bolts placed along the climbing route for fall protection should also be replaced if they become deteriorated or compromised.

3. In 2355.31(3), change the third sentence to read:

"Do not allow extensive or arbitrary placement and replacement of fixed anchors used for fall protection where the rock features such as cracks allow the use of removable fall protection such as camming devices and chocks. Do not allow extensive or arbitrary placement or replacement of fixed equipment where rock features provide natural opportunities for ascent, such as where fixed equipment is placed or replaced at a location that is otherwise climbable purely to make the climb easier, as opposed to at a location that is not otherwise climbable to enable a climber's ascent and descent of a climbing route identified in the applicable climbing management plan."

This change is recommended to emphasize the ethic that a climbing route ought not be bolted for fall protection if fall protection can reasonably be achieved using removable climbing hardware which is removed after each climb is completed.

4. Climbing "Management" can be a deceptive term. It could mean anything from shutdown to curtailment to thoughtful regulation. I hope the latter is the intention. We need thoughtful regulation. But I hope we recognize that that climbing can be compatible with the solitude of wilderness. Indeed, the solitude of wilderness can be experienced through climbing. Regarding bolts, it isn't bolts that detract from a wilderness experience; most non-climbing visitors who happen by a climbing area would pass by without noticing the protective bolts used for fall protection or the top anchors used for safely lowering or rappelling from a climb. In fact, these bolts and anchors are often hard to spot by climbers who are looking carefully while trying to find them. However, we must all take care to guard against climbing areas within wilderness areas that become too popular, too crowded, too noisy, and too impactful to the vegetation. When that happens, it is no longer wilderness. I think most climbers would understand if a permit was required for excessively popular and overused climbing areas, and support that. This is the same idea as permitting access to popular rivers during busy months. This prevents overcrowding, reduces impact to vegetation, and enhances the experience of the climbers and other visitors. Thoughtful management is far easier to accept than a full shutdown of a climbing area.

Thank you.

- James Martin