

Data Submitted (UTC 11): 1/18/2024 3:49:30 PM

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Comments: Climbing both in the United States and around the world is an increasingly popular and rapidly growing sport. The global climbing gym industry (not including equipment) is estimated at \$2.8 billion and expected to grow by another \$4.18 billion over the next 5 years according to Yahoo finance. The climbing demographic has changed over the past few decades as well. The sport started as a fringe 'dirtbag' endeavor to a mainstream Olympic sport. I am an example of that change. I am a pediatric intensive care physician in Phoenix Arizona. I pay taxes and my high earned (not passive or hidden) income demographic is the largest contributor to the US tax base. I travel to climb spending in local economies. I donate 10% of my after-tax income each year to outdoor and human causes (not an insignificant amount). There are thousands of climbers out there who are just like me. Our public lands do require appropriate stewardship and there are areas where climbing should be limited or managed. That stewardship should assess the needs of the current community. A community in which climbing is an embraced and popular sport. The climbing community has matured and strongly espouse an approach of leave little or no trace. Modern bolting techniques and anchor equipment have become increasingly discrete and can even be purchased as tan colored to blend in even further with the rock. I challenge the reader to go to a wall or crag without climbers on it and see how hard it is to find the bolts and anchors. The impact of this equipment is pretty darn minimal and much, much harder than following a mountain bike or horse path. I would argue impact of climbing is far less than that of encouraged and protected activities such as: fishing (animal waste, scavengers attracted, garbage, 2 stroke engines), ATV use (loud dirty engines, fires, garbage), equine use (literally poop on the trail) and hiking (garbage and dog poop in/out of bags) in the more Instagram popular areas of our great state of Arizona and our larger nation.

Bolted, also known as sport, climbing provides a significant increase in the safety margin compared to unbolted, also known as traditional, climbing. Modern bolting is yet again far safer than older bolting in terms of bolt spacing and risk of large falls or falls to the ground. Equipment exposed to the elements for decades wears out and requires replacement. The impact of limiting bolting upgrades and limiting new bolting will drastically increase the hazard of this sport. I would go so far as to say the current plan is akin to adding hidden obstacles to ATV or mountain bike paths with the intention of injuring users. The sport will continue to grow regardless of this posture of the USFS. This approach will result in increased injuries, and increased deaths. All leading to a greater burden on already understaffed and underfunded rescue services. No decent person wants to see others injured or killed. I implore the readers to re draft this policy working with leaders in the climbing community with a focus on management AND safety.

Attached is a bolted climb at a popular hiking area in Arizona. As you can see the bolts and anchor are difficult to identify. The bolts and anchor are visible from the exact spot the photo has been taken.

Thank you,

Kevin Engelhardt, MD