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Comments: My name is Michael Holland and I am a resident of Lander, Wyoming. I wanted to provide my encouragement to the National Park Service TO NOT MOVE FORWARD WITH THIS POLICY as it is now written. While I greatly appreciate the USDA Forest Service for all it does, as well as these recent steps to comply with new legislation, it must be noted that the request "...to issue general guidance on rock climbing management for National Forest System lands, including the application of the Wilderness Act (Public Law 88-577) for rock climbing and appropriate use of equipment in wilderness areas" DOES NOT MEAN CHANGE CURRENT standards and/or methods of climbing activities on USDA Forest Land. I read this to mean: "please put in writing how the activity of climbing merges with the Wilderness Act and how use of climbing equipment and the activity's resource impacts are managed." As such, the USDA Forest Service has a great advantage in response to this directive, as for over 60 years, there has been a clear and transparent management program in place. Let's look at some of those management tools now:

- 1) No use of machine powered drills or tools - if climbers are to safely enjoy the wilderness as a valued member of varied user groups who desire to be in the wilderness, and as members of said user groups who desire to explore the vertical terrain of such wilderness, they are able to place for their protection certain "installations" of certified equipment (bolts) using hand-powered tools only. This preserves the wilderness ethic of personal responsibility and skill in navigating terrain without the assistance of machines.
- 2) No destruction of wildlife, or other flora in an effort to pursue the activity. This is generally about bouldering and clearing large amounts of plants or terrain for safer bases to land after falling, but could also include trails and access to climbing by way of terrain destruction that could change the landscape.
- 3) Where possible, traditional climbing gear will be used over that of artificial installations or other forms of permanent forms of protection. This means that the prevailing ethic of climbers is that where there is space or access to passive/traditional gear placements (forms of protection to put our ropes through that can then be taken out of the rock after we move past that section of the climb) bolts shall not be placed. This is also true for anchors!

The aforementioned "rules" have been in place in the climbing community for decades, and the results speak for themselves; people from all over the world flock to the US to enjoy our climbing areas, many of which are known as the best in the world. This generates money for your agency, and our economy generally. Additionally, many non-profit and local organizations have taken shape with the distinct purpose of managing these ethics and preserving public land for us all- and non climbers as well- to use.

Climbing is one of the most amazing ways to enjoy America's Wilderness. I frequent the Wind River Range, and could tell you story after story of adventures spent battling weather, darkness, fear and fatigue while enjoined with my climbing partners in the arduous pursuit of those emotions you can only get OUT THERE. The proposed changes and policies would take that experience and relegate it to a bureaucratic pushing of the papers. Applications. Denials. Reapplications. People who have no acquaintance or relation or real contact with one another going back and forth for who knows how long all so that... what? If we are to pursue MANAGEMENT, let us remember that management is not control- it is a process by which something is able to happen without dysfunctional tension, friction or harm. Please remember this while considering your new directions forward, as you are crafting something that will have a disproportionate and very harmful result on only ONE USER GROUP.

How can you enforce such a policy? Do you have the staff and resources to do so? Why create such animosity and friction between your agency and a user group that has been so dedicated to leave no trace ethics, wilderness exploration, and the dissemination of the majesty of our parks and public lands??? Climbers, in my view, are your most staunch advocates of the wilderness, the most die-hard of those who believe in self-

sufficiency, preparation and risk management. Why put a policy in place that would hand over their ability to determine and manage risk to those on the ground, in an office, rather than those on the wall, hanging by a rope thousands of feet off the ground? Who is in a better position to determine the risk management strategy?

Thanks so much to whomever chose to read these words. I want to thank you from the bottom of my heart that you did. And I want to thank you for all you do for us as a member of such an important team of public servants. I ask that you consider my hope that instead of enacting this policy, please just use this as an opportunity to solidify once and for all the already established ethics that have worked so well over the past decades, and let us join together in evolving even more this amazing method of backcountry adventure and travel!! All my love.

MH

See attached a photo from the top of Mt Hooker in the Wind River Range. We had just topped out a big wall that took us 20 hours to climb. Notably, this route's first half had some "installed" anchors, but the second half did not, as a result of their being plenty of places to build traditional anchors. After passing the first half of the route, we had no choice but to push on to the top through the night! This is what I got in return: (the majesty of a sunrise from the top of the wall)!!