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First name: Emma

Last name: Nichols

Organization:

Title:

Comments: As a climber who cares deeply about protecting our wilderness and natural resources, I can understand how this proposed project came about. I don't think it's a bad thing to codify into law how climbers use wilderness areas, and set standards for the establishment of permanent anchors and other hardware. But how prepared are Forest Supervisors to perform or interpret a Minimum Requirements Analysis? Does the NPS really have the bandwidth to take on this project? I read through the entire proposal, and had trouble identifying what the Minimum Requirements Analysis might entail; will groups such as the American Mountain Guide Association, American Alpine Institute, and American Alpine Club be consulted as the government sets these standards and bases laws off of them? The concern from climbing organizations mainly seems to be about how Forest Supervisors could be given almost unilateral authority to ban climbing in their areas, with no way for climbers to appeal it. Even in areas that are best used by placing traditional cams and nuts (temporary, removable anchors), permanent rappel rings or bolted anchors can still be extremely important for returning to the ground. These anchors can also be vital in search and rescue missions for missing people or stranded and injured hikers, not just for climbers.

But the parts of the proposal that call for approach trails and parking to be marked on maps and possibly maintained by the NPS is something that really interests me. This approach could go a long way towards mitigating the impact of climbing on our parks and wilderness, much more so than any restrictions on permanent anchors.

I don't believe that this entire proposal is flawed, but I do have concerns about some of the language and grey areas concerning the implementation.