

Data Submitted (UTC 11): 11/27/2023 10:51:36 PM

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Comments: I am both a climber and a trailworker with the NPS and USFS. It is because of both these roles, I cannot support this proposal. There is a strong conservation ethic among rock climbers and a sense of responsibility to our crags. While it is true that not everyone perfectly adheres to these unwritten rules, we are also a self-policing community. Climbers do not want the degradation of our public lands and we are often their biggest advocates. The installation of "permanent fixtures" such as bolts or anchors has minimal environmental impact on the land - where it does, such as peregrine falcon nesting sites, communities close those areas and routes, often without intervention of land managers.

Adopting a policy of illegal until proven innocent (through lengthy and timeconsuming MRWs at an already understaffed and overburdened agency) will also have the effect of making climbing more dangerous. Climbers and advocacy groups such as mine (Climbers Association of Southern AZ- CASA) will not be able to legally replace gear that is broken, old, or unsafe. This will result in more accidents, injuries, and potentially even fatalities.

I believe in the Wilderness Act and preserving the characteristics of the wilderness. However, I also know that all Americans are owners of our public lands and should have a right to access and recreate upon them. Your own proposal acknowledges climbing as a legitimate use of wilderness (arguably far more so than the logging and timber sales you allow on FS land). One of the best attributes of the Forest Service as opposed to the Park Service is that it is a "land of many uses" - as a result, a more diverse group of people are able to enjoy our public lands in more diverse manners, hopefully resulting in a widespread swath of society committing to protecting our public lands and the environment. To restrict a sport with historic and cultural significance to so many people and places would be a slap in the face to our users.

Finally, as an agency employee I cannot see how this proposal could be implemented effectively or fairly. The agency, especially in Rec, is SEVERELY understaffed. Without providing permanent rec jobs or living wages to match the expensive cost of living in places like Aspen or Jackson (or really anywhere), we will continue to suffer a lack of personnel and a lack of talent. Who do you anticipate will have the time in their already overburdened schedules to conduct MRWs for every climbing area?

The language in your proposal is also unclear and doesn't make sense- is each individual bolt subject to an MRW? Each route? Each crag? There is so much left up to interpretation in this proposal and it frankly shows a lack of understanding of both the technicalities and the culture of climbing- an ignorance that may be shared by the very personnel you will make responsible for managing climbing areas.

Finally, it is the nature of all climbing that gear and material occasionally must be left behind. If you remove sport climbing bolts and anchors, you simply push more people into trad climbing (climbing where people insert their own "removable" gear as opposed to hooking into pre-established bolts). This is a bad outcome for multiple reasons. A. Trad climbing is more dangerous. With no safer options, there will be more bad falls, injuries, and fatalities. B. Trad climbing is more expensive and harder to learn- you are removing access and narrowing the scope of people who will be able to climb. Be prepared to see fewer women, fewer young people, and fewer people of color if climbing access de facto becomes restricted to trad climbing. C. It won't even solve the problem your proposal aims to amend. Trad climbing always inherently leaves debris behind. Gear becomes stuck that can't be removed. Carabiners used to rappel cannot be cleaned from below. Slings used to create rappelling anchors must be left behind at the tops of pitches. This leaves just as much "installation" but without any of the safety guarantees of an installed and maintained anchor or bolts.