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Comments: Apparently, the old ban on motorized drills did not work sufficiently to prevent fixed anchors in

wilderness. This was because it was rarely enforced and not a priority.

It is abundantly clear that these new regs effectively ban all climbing in wilderness. This is rather ironic since the Wilderness Act probably would not exist without the efforts of David Brower-a prolific wilderness climber. Moreover he was involved in the first use of bolts for protection---(1939, Shiprock).

These new regs create another edict that cannot be enforced.

Agencies neither have the time, money nor manpower to enforce compliance.

A close reading of these regs reveal that wilderness climbing is simply poorly understood by the agencies. For example, making it illegal to leave a piece of Perlon and a rap ring to retreat from the third pitch of an obscure wilderness route that dead ends---is just nuts. That piece of Perlon tat is unlikely to ever be seen again by anyone.

The agencies will need to vastly step up their enforcement. Even if they could, it will create ill will in the climbing community. It will alienate a growing constituency-at a time when outdoor agencies need allies rather than enemies.

Working with local climbing organizations to solve problems locally would be far better than imposing edicts.

Historically, this "unauthorized installation" philosophy was never meant for climbing anchors. We all know that. It is merely a ham handed, poorly thought out interpretation that was grafted on to an existing set of regulations in an effort to gain control over a problem that was never properly addressed.

Frankly, I fear these new regulations will be honored more in their breach. Climbers are unlikely to see a spectacular line, go back home, fill out an application and wait months for approval.

In my view, the proposed regulations will teach "ranger danger" rather than respect.

And climbers will adapt. New routes will continue to go up--- but they will neither be documented nor have names associated with them. This is already occurring in one nationally prominent park area.

Removing existing routes, that have been previously documented in guidebooks, is going to result in accidents. An inexperienced climber goes out, guidebook in hand, and starts up a route believing that the fixed anchors "are up there somewhere" and gets killed. While agencies may have sovereign immunity---the deliberate removal of fixed anchors starts to get much closer to extreme indifference.

Agencies would be far better served by working to emphasize clean climbing with minimal anchors left behind. They need to show climbers why their routes are creating problems.

A positive teaching relationship between the agencies and climbers would probably result in far better outcomes. Agencies need to be on Mountain Project explaining their problems, showing pictures, urging minimal impact, and encouraging clean climbing and a close cooperation.

For all these reasons and probably several more, I think it would be best to defer these regs until the problems are better documented and understood. I think climbers create problems for the agencies not out of malevolence but out of historical practices carried forward, loving climbing to death and ignorance.

Thank you for taking the time to read my comments.