

Data Submitted (UTC 11): 1/3/2024 7:17:08 PM

First name: Ryan

Last name: Gossen

Organization:

Title:

Comments: Prohibiting the placement of bolts is like prohibiting the creation of trails; it doesn't stop people from going there and making an impact, it merely sacrifices the ability to control and manage it. State, federal, and local agencies have been refining and implementing management processes to approve new bolts where appropriate for decades. It's not perfect everywhere, and establishing a federal standard might be ideal, but only if it is supported by the ability to study the needs of each area, to implement the right programs, and to enforce the new rules. A blanket restriction on new bolting would simply be breaking the programs in place without providing a real fix.

Shifting the decision of whether to allow bolting to a new party without providing that party with the expertise and funds to facilitate the decision will result in a default "No.". This is tantamount to a national ban on bolting.

Safety will be the first thing that is broken by such a restriction. This new rule does not provide alternative methods of protection with comparable safety, it removes safety in order to achieve reduced use of the wilderness. Is reduced wilderness usage really what we should be aiming for?

Instead, let's do the harder work of making a plan to facilitate the usage of the American wilderness by Americans. If a natural area is plagued by social trails, the solution is often not to fence the area off with razor wire but to design and build a clear, safe trail that channels use and reduces impact.

Climbers, as a community, are uniquely sensitive and self-policing regarding environmental concerns. Closures for raptor nesting, native land sensitivities, and even closures for hunting are considered sacred and are rigorously included in guide books. This is because climbing is inherently about being intensely immersed in nature. It is an activity that produces increased respect for nature and creates fanatics of public land. It should be encouraged and facilitated wherever possible by all state agencies responsible for management of that land. The most straightforward way to create a safe, focused, managed impact on the land is bolting.

Thank you for your attention,

Ryan Gossen

ryangossen@gmail.com