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Comments: I am writing to express my concern on the classification of fixed anchors as prohibited installations in designated wilderness areas. Please amend your guidance to designate fixed anchors as essential to the wilderness climbing experience.

I believe that prohibiting fixed anchors would negatively impact climbing safety by disincentivizing the maintenance and replacement of existing anchors, most of which work is currently done by volunteers. The "bolt ban" would also threaten access to historic climbing areas and prevent exploration of new routes, going against the Wilderness Act's stated intention to provide for "unconfined recreation".

I also want to note that I am in support of developing climbing management plans, with land managers working closely with the local climbing community to provide guidance and working procedures for access and new route development. I agree that rock climbing is increasing in popularity, with associated impacts such as crowding, erosion, destruction of cultural resource, etc. and that regulation is needed to preserve the wilderness experience and wilderness resources for the future. This should be done by targeting specific behaviors and locations, and not through a blanket ban on fixed protection.

Regarding Section 2355.31 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment Outside Wilderness

#3: Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Thank you,

Ginger Jui