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Comments: I am urging you to reconsider implementation of the proposed climbing management guidance as it would create significant safety issues, result in more injuries and death, threaten world-class climbing routes (many were established prior to wilderness designations), obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. I do not believe that "permanent installations" as originally written in the Wilderness Act, refer to bolting to allow safety during climbing or the leaving behind of slings fixed for emergency descent.

New bolting and replacement of old unsafe bolts should not be banned and should have its own category, independent of permanent installations. Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

Climbers by nature are conservationists. As they climb in the outdoors they learn to love and protect the resource which their sport requires to exist. Bolts are an integral part of that sport and are necessary to prevent injury or death. If new bolting or replacing old bolts is banned, this will not stop people from climbing, but it will result in more injury and death.

It's important that one of the leading conservationist groups (climbers) are not alienated. Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

I therefore propose that the National Forest for a specific area works with the local climbing community, whether they be a group, or leading individuals, to work out an acceptable practice for the continuation of the freedom which climbers currently enjoy.

For example:

- 1- agreement that bolting hardware shall be camouflaged prior to placement.
- 2- agreement that power drills shall be used to create more reliable placements.
- 3- agreement that only non-corrosive hardware shall be used.
- 4- agreement that slings left behind will be retrieved at the earliest possible convenience.
- 5- cooperative engagement with climbers to oversee and report on dispersed camping usage and use of illegal fires.
- 6- cooperative restoration events at local crags between climbers and the National Forest.
- 7- establishment of climbing area ranger volunteers to patrol sensitive areas on a regular basis, and practice real-time outreach when on patrol.
- 8- permitting in heavy use areas.

Thank you,

