

Data Submitted (UTC 11): 1/5/2024 5:10:13 PM

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Comments: As both a climber and a supporter of wilderness areas, I urge the reconsideration of part of the "Managing Climbing in Wilderness Areas" proposal. While the proposal does outline regulations that are important to the conservation of wilderness areas, such as management of new fixed anchor installations, other parts of the proposal seem ill planned. The most foolhardy of these is providing land managers the ability to manage fixed anchor repair and replacement, and to a lesser extent the ability to remove fixed anchors. Given the rich history and abundance of climbing routes in wilderness areas, it would be tragic to allow for the gradual decay of established routes. While temporary or seasonal closures can be essential for conservation efforts, permanent closures of areas or restrictions on route repair/replacement projects are contradictory to the recreational component of wilderness areas. I propose an edit to the proposal that ensures the right to repair/replace fixed anchors. This would also remove a substantial bureaucratic burden from the NPS and USFS that would be established by this proposal. A protection of existing routes should be considered under similar reasoning. While there are likely niche cases of "overbolting", routes established in accordance with minimum bolting practice should be protected as a part of the history of wilderness areas.

Additionally, I propose the addition to the proposal. While I disagree with the assessment that fixed anchors can interfere with the recreational ability of others, fixed anchors can be unsightly. Therefore, I propose the addition that all new installations or replacement must incorporate route camouflaging techniques when the techniques can be implemented without compromising the structural integrity of fixed anchors. The easiest method of bolt camouflaging is to use non-reflective fixed anchors. This would largely eliminate the visual burden I assume the proposal refers to in its discussion of interference. Additionally, chalk could be banned. While this is a more extreme measure, it would hide routes from the casual observer.

Overall, while this proposal does include necessary components to conservation, it goes too far in its effort to regulate historically acceptable recreation in wilderness areas. I strongly urge the reconsideration of the proposal in accordance with feedback from the public in order to avoid the almost assuredly vague protections to climbing that would originate from U.S. legislature were this proposal to go into effect unchanged.