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First name: brian

Last name: boyd

Organization:

Title:

Comments: I am writing regarding the proposed rules drafted by the National Park Service and US Forest Service that have the potential for substantial negative effects to Americans - not just rock climbers, but also the many individuals and businesses that earn an income from the \$1 trillion dollar a year outdoor recreation industry.

Rock climbing is a historically prominent practice in the United States. Personally, I have been a climber for most of my life, and have visited many areas on federal land, including national parks, forests, and wilderness areas. I am also an active steward of climbing areas, and have been involved in developing new rock climbs and areas, and also maintaining aged hardware at existing areas. I also donate both time and money to help keeping climbing areas safe, both in the United States and other parts of the world. Whether it has been in Yosemite, Joshua Tree, or other areas, other outdoor users seem particularly interested in talking to climbers, and learning about the sport. Despite spending decades outdoors, I have never personally encountered anyone - wilderness area or not - who has objected to the presence of in situ anchors. You see this interest reflected in the scores of tourists with binoculars at the base of El Cap, climbing-specific interpretative signage at Red Rocks, and so on.

There is also a substantial historical precedent for climbing hardware vis-a-vis the Wilderness Act, as anchors are "substantially unnoticeable" - e.g., these anchors are typically painted over to blend in with the surrounding environment. Having climbed in many wilderness settings, I can attest that fixed anchors are rarely visible from the ground level, and sometimes even challenging to find when hanging on the side of the cliff.

If the draft guidelines were to pass, this could eradicate many of the most prominent climbing areas in the country: In the best case, anchors would decay over time, likely leading to accidents and fatalities. In the worst case, entire climbs, and areas could be stripped of all safety hardware. Under these conditions, climbers who are injured or require rescue are far more likely to suffer. Proposed guidelines regarding replacing hardware describe a process which is extremely arduous and bureaucratic, presumably as a tool to make hardware replacement less likely.

There are a number of alternatives to help satisfy the spirit of the draft regulations in a far less burdensome way. In Yosemite, for example, local climbers maintain hardware using hand versus power tools. Similarly, public-private partnerships have found ways for climbers to assist government agencies in different contexts. In Colorado, for example, climbers have assisted forest service staff by monitoring nesting sites for endangered species, freeing up government manpower for other critical tasks. In general, the vast majority of climbers that I have interacted with place a high emphasis on environmental responsibility and stewardship, and I suspect there would be no shortage of volunteers to help maintain fixed anchors in wilderness, and other federal land settings.

There are legislative initiatives underway which also challenge the necessity of the proposed USFS and NPS rules. I have contacted my elected officials in the House and Senate, both to oppose these proposed rules, and also to support the Protecting America's Rock Climbing Act, and well as the bipartisan EXPLORE Act.

Thank you for the opportunity to comment on these proposed rules.