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Comments: The proposed regulation of climbing anchors reverses long precedent, is based on faulty logic and is unworkable. Federal land managers don't have the bandwidth or expertise to manage climbing anchors, this will lead to a de facto ban on climbing on Federal lands.

Climbing anchors predate the Wilderness Act. If they were "structures" then most Federal Lands would not have qualified as wilderness. Arbitrary and capricious redefinition of anchors as "structures" is illogical, they were present before wilderness designation. They were, and for the most part remain, few and inconspicuous.

The burdensome and inherently contradictory requirements for permits are prima facie evidence of the intent to simply ban bolts. The proposal asserts authority while simultaneously admitting incompetence, a stunning exercise in bad governance.