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First name: Joshua

Last name: Bromberg

Organization:

Title:

Comments: I am writing today in regards to draft policies labeling fixed anchors and bolts as prohibited installations. In their current form at their best they are unenforceable and at their worst they are dangerous.

First I want to address the safety concerns regarding no grandfathering and requiring MRA's for even routine repair and maintenance. These climbs exist and are established and documented in guidebooks, websites, and more. People will continue to go to these climbs, and adding rules that make it more cumbersome to maintain the gear will endanger future users. While it would be a daunting task to gather a comprehensive list of all climbs to grandfather that step would still have to be taken to perform an MRA and/or remove existing equipment. The best and easiest way to keep people safe is with a grandfather clause. If the money/time doesn't exist for that then it doesn't exist for any of these policies.

Even with a grandfather clause subjecting any maintenance new or old to MRA's still poses a problem. As stated before adding bureaucratic steps the prevent safety critical improvements is a danger. People will go to these areas to climb and delays in replacement will put their lives at risk.

I touched on it earlier but the current policy is unenforceable and that also makes it dangerous. I question if the resources are available to even find and tag every climbing route, let alone analyze and approve or remove their gear. If the policy goes into place with no analysis or installation removal, routes are deemed illegal, many people probably won't even know since climbing itself isn't illegal, just the bolts. They go out use this aging now illegal to maintain equipment, until eventually it fails and someone falls to the ground.

I am not unsympathetic to the desire for some sort of regulation. The outdoors is for everyone and one group's enjoyment can stifle another's, for example I have many trails I no longer hike due to reckless mountain bikers. The current policy would be akin to requiring an MRA for each piece of wood or screw in a bench. I would like to propose instead of MRA's for new individual routes that instead MRA's be for new crags (an area with a grouping of climbs together) instead. This would drastically reduce the amount of paper work while still allowing agencies some control over development.

Climbing has brought many new people to the outdoors and I would like it to continue to do so. Sport climbing which relies on fixed anchors is a safe and less committing (both risk and financially) way for climber to engage with the outdoors doing an activity they love in a way that simply can not be reproduced in a gym. While the current policies goal may not be to stifle climbing it will absolutely deter people who were on the fence about trying to be outside. I encourage you to work with national and even local climbing organizations to help draft regulations similar to how such organizations were involved in federal legislation, specifically H.R. 1380. We also care and want to preserve the environment and will work with you to find a way to help accomplish that effectively.

I want to leave it with this. Exploration means to go new places and we live in a 3 dimensional world. Exploring is more than simply forward/backward left/right it is also up. And there are many places we will never reach and explore if the policies as written go into place. They will hinder not help our exploration of the outdoors.