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Comments: Dear US Forest Service,

I have several concerns with the proposed directive. The first is about safety. Removal or preventing the replacement of fixed hardware would put the lives of climbers, climbing on existing routes, at risk. Removal of hardware could lead climbers to take on more risk in the ascent and descent phases of a climb. For example, if an established descent route is removed, climbers may resort to attempting to rappel another section of the cliff with more "natural" features, albeit dangerous ones, eg. loose rock that could be knocked off, wounding or killing anyone it strikes. There should be no restrictions on replacing aging hardware. If climbers are forced to continue using aging fixed hardware, it's only a matter of time before that hardware could fail, killing whoever last attempted to use it.

The second concern is that this new directive could inadvertently cause more damage to wilderness. Descent routes are often placed on blank sections of the cliff and only require a small number of bolts to allow climbers to rappel their way down. These types of descents minimize changes of ropes getting stuck and minimize the traversal of surfaces prone to erosion. If these types of descent routes are made illegal, climbers may be forced to find alternative descents. These may be gullies with loose dirt, rock and plant life, prone to erosion. They may involve the use of trees to rappel, damaging the trees over time. Climbers may be forced to leave behind slings, or stuck ropes, which will essentially become trash on the mountain. My point here is that a few bolts on a cliff can often prevent a much larger impact to the area.

My last concern is that requiring MRAs, approvals and permits for any new fixed hardware would be onerous, expensive, difficult (or impossible) to manage and potentially dangerous and harmful to wilderness, for the same reasons I listed above. I believe that there could be reasonable restrictions put on new routes, such as limiting the number of "sport climbs" in wilderness (bolt intensive climbs) and/or requiring a permit for new hardware at already established climbing locations. These types of restrictions would be cheaper, easier to manage and have a greater effect in protecting wilderness.

Sincerely,

Scott Johnson, PhD