

Data Submitted (UTC 11): 1/22/2024 5:22:45 AM

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Comments: Dear Sir or Madam,

The policy proposal in regards to climbing seems to significantly increase the bureaucratic burden as well as the work load of the forestry staff and severely limit the amount of climbing recreation which would be possible.

1) The language in regards to "minimum necessary to facilitate primitive or unconfined recreation" is very much dependent on the standard of climber. For example the route "The nose" was successfully free soloed by Alex Hannold. Therefore, the minimum necessary is 0 for this route and climber. However this would limit climbing opportunities to a couple of elite climbers. The routes should be reviewed with modern climbing standards (trad or sport) and not outdated ones when the routes may have been climbed first. Only this allows this sport to be inclusive beyond a couple of elite climbers.

2) Existing routes should be grandfathered in, and only be removed in case that is determined to be necessary. That grandfathering should automatically allow the rebolting with modern hardware to ensure safe climbing. Broken anchor points during rappelling typically will end with the death of the climber.

3) Climbing bolts are by itself primitive and unobtrusive especially when painted in the color of the rock. They are very hard to see from a distance of more than 30 meters. A bolt has an area of approx 2 square inches which is much smaller impact than any hiking trail. If there is no bolts than climbers would start using vegetation like trees. These would be impacted the friction of slings and ropes. Therefore a bolt by itself should be considered minimum impact to the wilderness as well as allowing minimum impact in the wilderness.

4) A lack of safe bolts would significantly increase the risk of injury and death due the usage of vegetation or questionable bolts which were not able to be replaced due to permit under this new proposal.

5) Non-wilderness areas should have much easier regulations for establishing climbing areas. Especially the creation of front country easily accessible climbing areas would reduce the visitor pressure on wilderness climbing areas. Climbing gardens in the European Alps focus most climbing into easily accessible areas which reduces the number climbers in the more remote areas.

Overall, the approach taken in this policy is to make climbing untenable. Please help to rework this policy which also enables climbing responsibly and safely.