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Comments: To whom it may concern,

The proposed changes to climbing management in national forest and in wilderness areas are both promising and concerning. It is good that climbing is gaining recognition as a viable wilderness activity. There are indeed increasing numbers of people looking to recreate in the vertical realm in wilderness settings. The problem with the current proposal is that it does not correctly address the hardware used in said activities. The metal hardware that is set to protect climbers is not optional. It serves a specific need and should only be determined by climbing experts.

The hardware is a specific concern in this drafted directive because it takes the safety of the users out of their own hands. If you were to think of a climbing route as a trail there would be specific safety measures this community would need to ascend their "trail" and similar to what a horse back rider might need for their trail. We would not take trail maintenance out of the hands of a horse rider or hiker if there presented a need for such activities. These decisions are made in the moment and only regard user safety. Why should we do such a thing with climbers.

It seems at least some of the controversy around climbing revolves around the structure of the safety devices. Sure these safety measures are steel pins in the rock, but they are no more permanent than a trail is on the landscape. They serve as markers for the path upward (much like cairns), but also as safety devices (like bridges or trail stabilizers). They are minimally invasive and largely unnoticeable unless you are looking at them from up close. They are much less noticeable than the trails, bridges and other permanent structures within wilderness already.

Arguments for taking these safety devices out of the hands of the users are reckless and potentially dangerous. Climbers should be allowed to provide as much safety to their recreation as necessary. It should not be decided by outside interests that seem to care more about 'permanent installations' than their safety and route finding properties.

I am for recognizing climbing as an approved activity, but I am against wording of this directive that takes away maintenance and emplacement of safety equipment away from climbers. There needs to be specific wording allowing replacement of degraded hardware and emplacement of new hardware where necessary. An all out ban on bolting for climbing is heavy handed and hinders the progression of climbing as a wilderness pursuit.