

Data Submitted (UTC 11): 1/23/2024 8:08:45 PM

First name: Geir

Last name: Hundal

Organization:

Title:

Comments: I am writing in response to the request for public comment on the recent proposal made for regulating rock climbing in Wilderness.

I have been rock climbing in excess of 100 days per year since 1997, am a certified rock climbing instructor through the American Mountain Guides Association, guide and teach rock climbing part-time, and am the author of two rock climbing guides in southern Arizona. I've also been active in our local climbing nonprofit, which has worked in cooperation with the Forest Service on numerous volunteer work days picking up trash, cleaning up graffiti, and helping with erosion control projects. All this is to say that rock climbing is a central focus of my life.

I am intimately familiar with thousands of established rock climbs in Wilderness areas all through the country. The current proposal would upend a half-century's rock climbing history in Wilderness areas, the vast majority of which were established in a manner that are respectful of, and consistent with, Wilderness. These climbs were established primarily using removable protection that is impactless to the surroundings.

However, in virtually all climbing, some degree of "fixed" protection is needed. This involves drilling a tiny 3/8" hole in the rock and placing a bolt in it. These are generally invisible from the ground and can be re-used by future climbers with no further impact. Once every few decades, these bolts are carefully removed, and a new bolt is placed in the same position, re-using the original hole. I know this because I helped develop some of the tools to accomplish this replacement.

The current proposal would outlaw all such safety points and create an untenable system to replace them. To do so at this point, after allowing their use for decades, is a radical change. Realize that these fixed points are for safety - if they are removed or left unmaintained people will be injured or killed.

Frankly, it appears that this draft policy was produced without the primary stakeholders - rock climbers - present at the table. No reasonable, seasoned climber would agree with the draft as written. When this policy is redrafted - and I hope it will - I asked that you have a representative from the Access Fund present to provide some guidance.

Finally, while I pride myself in compliance with land manager guidelines in my own climbing, I can't see myself following these policies as written. I think most climbers would choose not to follow them. I think it is reasonable to limit fixed protection in Wilderness, and to continue to enforce the guidelines that they are placed/maintained without motorized equipment.

Please re-write the draft policy with a representative of the Access Fund present to create a policy that won't jeopardize the safety of climbers and the rich history of Wilderness climbing on public lands.

Regards,

Geir Hundal
Tucson, AZ