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Comments: Climbers are well-versed in the practices of mitigating impacts to vegetation, cultural sites and sensitive species. Most areas in the United States with climbing nearby have Local Climbing Organizations that do work closely with their land manager to recreate responsibly. For example, Allied Climbers of San Diego works closely with Cleveland National Forest (through Lee Hamm, the Recreation & Land Officer) to ensure that climbing activities do not disturb raptor nesting. This collaboration has been successful not only to allow for responsible recreation on

USFS land, but also reduces the workload of the personnel by having members of our organization monitor raptor activity. We would like to encourage the NPS to work with LCOs as well as national groups such as Access Fund, ASCS, and large climbing gyms to develop ways that allow climbers and other user groups to recreate unconstrained wilderness areas while remaining primarily shaped by nature.

Ultimately, because climbing is very low impact, and climbing groups already care deeply about the long term ability of everyone to enjoy the beauty of our outdoor spaces in their natural condition, the climbing community is one of the best advocacy groups for preservation in Wilderness areas.

Fixed gear is not incompatible with wilderness areas, and how prohibiting the installation and replacement of fixed gear can actually lead to more degradation of fragile environments.

Having safe, well maintained, and strategically placed fixed gear actually reduces impact.

This is analogous to having designated trails,

Restricting the replacement of existing bolts, or the addition of new bolts, would create even more demand on SAR. Rappelling off of bolts or fixed anchors is often the only option for climbers to

self-rescue before activating SAR resources. The proposed directives would prevent climbers from safely retreating from routes without SAR rescue, for example during inclement weather

The new directives will make existing routes more hazardous by discouraging maintenance of bolts and anchors. Fixed gear often needs to be replaced every couple of decades. Without the ability to leave behind equipment or modify existing slings or pitons, climbers will be encouraged to trust the existing gear left exposed to weather over the years. Aging hardware makes climbing routes and descents less safe, which causes more accidents.

While the plan does outline a path for getting fixed gear approved, the path to approval is many steps long. This will not only tie up limited time and bandwidth of NPS personnel, but create impractical, long, delays in replacing unsafe fixed gear. Additionally, existing responsible user groups will often be at the mercy of a single land manager. This excessively long process for approval will compromise the safety of wilderness users.