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Title:

Comments: I'm writing to strongly oppose these new unnecessary restrictions to climbing in NPS lands. The Southern Arizona climbing community has a long and positive history on National Forest system lands in the region and has been effectively collaborating with the Coronado National Forest for decades to improve forest lands and steward climbing areas via dozens of volunteer efforts. A considerable amount of community resources has been committed to these collaborative stewardship efforts, including support from local businesses and non-climbing organizations

Rock climbing is a well-accepted and celebrated activity on the Coronado National Forest (CNF), with routes established well before the 1964 Wilderness Act. The CNF celebrates rock climbing on its homepage as a major forest activity. Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the 1964 Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness and Park character while providing for primitive and unconfined Wilderness climbing.

It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness and National Park climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades. Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of a climbing route. Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal, and support expeditious maintenance of fixed anchors. Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

USFS and NPS locations need to begin or continue working with the local climbing community as an essential part in maintaining climber safety and promoting outdoor recreation. Climbing is a very healthy outdoor activity for our young people. Furthermore, our economy and southern Arizona benefits significantly through access to the outdoors and outdoor activities. For our young people to get outside and participate in healthy lifelong activities are dwindling every year. Thank you for taking the opportunity to read my note, and once again, I strongly opposed these new rules.