Data Submitted (UTC 11): 1/28/2024 2:11:11 PM First name: Nicholas Last name: Kainrath Organization:

## Title:

Comments: This draft policy is flawed and will be detrimental to climbing as we know it and lead to numerous safety concerns for a small user group of wilderness areas and/or non-wilderness NFS lands. Fixed anchors are essential for safe climbing. As climbing is an approved use of wilderness areas and NFS lands, if you remove the potential of high concentration of fixed anchors i.e. sport climbing areas, you essentially remove the possibility of developing new climbing areas; and therefore kill the progression of the sport. "Clean climbing" techniques and LNT principles is essentially going to kill people and/or prevent them from ever getting to experience climbing in certain areas. It's like removing trails in wilderness areas and telling people they can still go backpacking. Or removing bridges because they are an eye sore and encouraging people to ford rivers.

Not all cliffs will be bolted. Development of climbing areas will be limited by access and the number of hours/miles it will take to access an area. Therefore 95% of wilderness areas and NFS lands are essentially never going to be developed as "high concentration" of fixed anchors (sport climbing areas). There should be a certain level of acceptable impact on NFS lands, just like allowing mining, logging, trail developments, road construction, powerline corridors, etc.

Going through an MRA process will be a lengthy process that will also kill climbing. Tribal consultation takes months, cultural resources surveys (and SHPO consultation) take years, wildlife studies take years. This will all directly contribute to bad bolts not being replaced because of government delays. I believe health, life, and safety should trump government bureaucracy and red tape.

Is the USFS willing to accept the direct increase of risk of climber injuries and death in wilderness areas? This will no doubt increase the number of backcountry wilderness rescues and body recoveries by implementing and enforcing this draft policy, preventing high concentration of fixed anchors from going in, and creating a lengthy process for replacing unsafe bolts.

Climbers are such a small user group using areas that typically have minimal conflicts with other user groups as climbing areas are hard to reach and not "destinations" to most other user groups.

What other alternatives have you considered to this extreme change?

Education is the key to changing the world, not lengthy MRA processes that will prevent, delay, and/or lengthen fixed anchor replacement and development of climbing areas.

I am a taxpayer, have worked for land management agencies, and frequent visitor to such places. Please do not kill climbing. Please do not indirectly increase the number of injuries and deaths to our beloved community by forcing the climbing community to adhere to this extreme policy change. Please allow for people like me to be moved by wilderness and NFS climbing, and have safe and fun experiences by clipping bolts (fixed anchors). Please consider alternatives to such an extreme change before implementing this policy.

Regards, Nick