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First name: Hezekiah

Last name: Austin

Organization:

Title:

Comments: This proposal for guidelines is ill advised given the resources supporting it and the disconnection with the climbing community it impacts.

1) Public land management is already overworked. The proposal does discuss approving fund but it doesn't discuss fund specifically for additional personal to perform the Minimum Requirement Analysis. New authors cannot be placed without the relevant land manager's approval and a completed Minimum Requirement Analysis which forces climbers to wait on replacing unsafe bolts until the paperwork is completed.

2) Current equipment placement would technically be illegal until approved. This equipment was placed before the proposal was created. The burden of proving the placed equipment is unsafe or more than required should be on the land management. And said case should not be made just internally to the organization. The general public and climbing community should have a voice and vote in the maintaining of existing routes. Even a simple change such as grandfathering in existing routes and allowing one-to-one replacement of existing bolts would greatly improve this proposal.

3) Non-climbers are deciding if a climbing route has the minimum number of fixed equipment required. What standard is going to be used for the Minimum Requirement Analysis? For example, I'm decent climber. I'm not awesome and I'm not horrible. I need more bolts than a really good climber would. Trad and free soloing require no fixed equipment. Is the Minimum Requirement Analysis going to take into account different climbing ability and the different forms of climbing? Or is it depended on the local land manager educating themselves on the different forms of climbing in order to make a decision.

Overall, I believe this proposal needs to be edited to reduce the workload it will create on the land management personal, grandfather in current climbing routes and allow the maintaining of those routes, and create a clear, published standard for how the Minimum Requirement Analysis on climbing routes shall be performed by the land management.