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Comments: I have to say, I'm dumbfounded by this proposed regulation. Normally, I appreciate the USFS making public lands accessible to me (less so to logging companies) and for providing and maintaining trails, campgrounds, toilets, and roads, but the proposed regulation ("SM 2355 Climbing Opportunities #ORMS-3524") feels like it was written without the faintest idea of what climbing is, how it works, how many people do it, where they do it, or any of its decades-old ethos of leave no trace and clean climbing. While perhaps well intended, it is utterly unworkable.

Of course I care deeply about American wilderness and leaving untrammelled lands untrammelled, but I also recognize that climbing, especially rock climbing, is becoming more and more popular. Some places, like Lover's Leap near Lake Tahoe or the Red River Gorge, are mobbed with climbers whenever the weather allows (and often when it doesn't). In these kinds of places, placing fixed anchors (whether bolts or tat or otherwise) can help keep the climbers safe AND protect the environment. Imagine, for instance, that this regulation means cleaning the tat (fixed slings and pieces of rope) around a tree used as an anchor by party after party that climbs a route. With the tat around the tree, the tat stays there, and it pulls on the tree when people rely on it to rappel (usually only as much as one person's body weight for a few seconds to a couple minutes at a time). Without the tat around the tree (under the proposed regulation), climbers will just put their rope around the tree, rappel, and then pull their rope from the bottom. So instead of subjecting the tree to a little weight from time to time, people now subject the tree to the same amount of weight AND the friction of ropes getting pulled across their bark. This will eventually kill the tree (bad), causing the loss of an anchor for climbers (bad) and erosion (bad).

I also fail to see how any park could enforce this regulation. First of all, the guidelines for what fixed anchors are necessary are imprecise and subjective. Second of all, because many parks are indeed wilderness zones, climbers will be able to drill bolts or leave tat as they see fit anyway. Third, do you intend to fine or otherwise punish climbers who do leave tat or a piton or a nut (or a screw!) to excise themselves safely from a route at the end of a long day or in a dangerous storm? The uncertainty here leads many to conclude--reasonably--that this regulation will encourage people to make worse decisions and descend unsafely to abide by the regulations. Fourth, this regulation feels draconian next to many permitted activities in wilderness zones or national parks. For instance, consider a pair of anchor bolts 500 feet up a cliff face and the practice of allowing campfires in places like Yosemite Valley. Do the bolts ruin anybody's view or sense of majesty of the place? No. Do they pollute the air that everybody breathes or directly contribute to CO2 emissions? No. Do they risk starting a forest fire in the Valley? No.

Please, please do not enact this proposed regulation, and please go talk to more, some, any climbers before you enact anything in its place.