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Comments: I would like to start by saying thank you to the organizations that tirelessly manage the public lands that I have spent my adult life exploring and enjoying. I am an avid outdoorsman and have spent many years in the western United States hiking, backpacking, flyfishing, and rock climbing. After reading the proposed management plan I am thrilled to see that climbing is being acknowledged as a completely excepted activity to perform in these areas and that the equipping, monitoring, and replacement of climbing hardware is left in the hands of the climbers themselves. I believe that climbers are the best recourse to ensure the safety of climbing hardware.

I do have a few comments I think should be considered based on my understanding of the proposed management plan.

First, I do have a concern that the proposed legislation mandates governing bodies create a plan but does not allocate any additional funds to facilitate the creation or management of this plan. With limited budgets and many competing priorities, I fear that there will be a gap between the passing of legislation and the formation of plans by land managers. This may result in many missed opportunities for new climbing routes, confusion around the legality of existing routes, and potential safety issues caused by any halt to the replacement of existing hardware. Secondly, to my understanding the proposal mandates land managers to create this climbing management plan but does not set any timelines to do so. With strained resources these plans may take longer than expected to be developed leading to the same concerns as above.

Additionally, the proposal does not mandate that the plan must allow fixed anchors where appropriate. With some of the appendix material such as the pre-developed permit I think it should not be a huge stretch to quickly develop plans in many management areas that openly allow permitted bolting throughout the area. As our sport continues to grow, I think that some regulation to ensure proper bolting techniques and equipment can only increase the safety and trust with land managers. Documenting the development of climbing routes and the hardware used will also be a benefit to land managers even though they hold no reasonability for the upkeep or use of said hardware.

Last, I would like to push back on designating fixed climbing anchors as installations. The minimal nature of the hardware used in climbing routes leaves little to no scar on the landscape in comparison to the greatly increased safety it provides. These routes will also direct users to pre-existing areas that can be more easily managed by land managers and tended to by the climbing community. From my perspective these routes are no different than existing trails and backcountry camp sites and align with leave no trace principles. Climbing in wilderness areas is much different than climbing at a busy bolt intensive crag seen in some areas. Climbers appropriate this and I believe we want to preserve the adventure of wilderness areas. A few small bolts although seemingly unimportant, make a huge difference in keeping these adventures safe. It is also worth mentioning the tax revenue that is generated from the gear used to access these locations, along with the donations to both public agencies and climb non-profits that aid in the caretaking of the areas we love.

In closing, thank you for the effort in developing a great proposal that acknowledges climbers in this way and providing the opportunity for our community to comment. I greatly appreciate all the work it takes to maintain the wilderness we all love so much.