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Comments: Over the past seven years I have served on the board of directors for two local climbing organizations, the Red River Gorge Climbers' Coalition in Kentucky and Pikes Peak Climbers Coalition along the front range of Colorado. I have been a community ambassador for Access Fund for the state of Colorado for two years. For seven years I have worked with Climbers for Bat Conservation based out of Colorado State University in Fort Collins, CO.

My extensive experience both as a climber and community leader inform the following opinion.

The process that has been described is unrealistic. Executing a climbing management plan with a local federal land manager is not easy. It requires a highly dedicated group of volunteers to run a local climbing organization that can produce these informal agreements (e.g. Memorandum of Understanding, Climbing Management Plans, Environmental Assessments). Larger organizations such as the Access Fund are an intermediary to local climbing organizations and federal land managers. They have guided many community leaders through this complicated process. It takes an exceptional group of volunteers to formalize these working relationships under the current legislation. The proposed guidelines will be too cumbersome for even the most highly effective local climbing organizations that have paid staff (e.g. Red River Gorge Climbers Coalition and Boulder Climbing Coalition).

The vast majority of federally managed areas do not have a dedicated local climbing organization with paid staff to follow these guidelines. There will be scenarios where a small group of motivated individuals and a best faith effort will lack the resources to follow the proposed guidelines.