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First name: Jen

Last name: Stagner

Organization:

Title:

Comments: I would like to call to your attention that there has been a widespread campaign of misleading information around this proposed policy.

The Access Fund has been pushing out a panic message that the proposed policy is a "Bolt Ban". This lie has been spread across multiple social media platforms, in live webinars and even on gear retailer websites. 'War on Climbing' and 'Bolt Bans' stir up outrage and panic - but it simply isn't in the policy.

Please keep in mind as you review comments that there was a tremendous campaign telling climbers to reject this policy. In a few personal interactions with climbers via social media and among personal friends in the professional climbing community - it was abundantly clear that very few people were actually reading the proposals. They were trusting the Access Fund.

Fewer still understood what an MRA is or how the policy would likely play out in a practical way. The fact that climbers are expected to be fully engaged in every part of the process -and provide the expertise and on the ground maintenance of routes and anchors -has been completely lost on many people.

My take on the policy- as someone with professional experience in Wilderness Management with the USFS (and having drafted many MRAs for various projects and proposals) is that - if anything- the policy seems biased in favor of climbing.

The language around fixed climbing anchors and equipment facilitating Unconfined and Primitive recreation is such a golden egg to the climbing community that it is mind-boggling that they have chosen to protest it.

It is ironic that Wilderness Watch has already expressed their dissatisfaction with how gratuitous the climbing policy is towards allowing fixed anchors and equipment in Wilderness. They contend that Primitive and Unconfined recreation opportunities are already abundant and therefore saying that fixed anchors are the minimum necessary to protect this quality of Wilderness Character is a bogus argument.

Calling this policy a "bolt ban" is a lie.

It really seems as though the Access Fund has invested so much effort into the PARC Act (which would set very dangerous precedence for modification of the Wilderness Act) that policy from the NPS and USFS which doesn't explicitly state that climber can do whatever they want, wherever they want with no oversight will be rejected or stalled while they attempt to pass the PARC Act.

With the rate at which climbing gyms are producing new climbers, the multi-million-dollar industry ties to gyms/equipment/ clothing and the transition of climbers from gym to crag (with often very little LNT training, ethics and skill building or mentorship on a broad scale) the idea that climbing can continue to fly under the radar with zero accountability for how and where routes are established is grossly irresponsible.

Public lands and Wilderness in particular are already under tremendous pressure to accommodate growing numbers of recreational demands. Having a special user demographic that can establish routes with no EA or NEPA, no cultural resource surveys, no evaluation of water, soil, rare plant or wildlife impacts etc. is unsustainable and absurd.

Climbing can be compatible with Wilderness. The proposed policy even suggests that some bolt-intensive routes may be appropriate in Wilderness, and it places the primary responsibility for managing these routes and the

formation of a climbing plan of the active engagement of the local community.

This policy is pretty much handing the climbing communities a key to the city, so it is baffling that they continue to fight it (again -probably due to the Access Fund spreading a massive misinformation campaign based on the person interpretation of their lobbyist- who although he does seem to mean well - has a deep misunderstanding of Wilderness).

Off my soapbox and to my comments:

1.What resources are / would be available for Forests which may be navigating a complex or contentious situation with the creation of climbing plans? Will there be an opportunity to use a third-party mediator to facilitate the planning process in highly complex or contentious situations? Will the WO or RO offer funds / resources to assist with the planning process?

2.While many Forests already have excellent working relationships with local climbers [Durango Climbers' Coalition is a great example of a partnership that works] - some may have more than one primary climbing group - or no formal group at all. This could make trying to establish a plan with local climbers difficult. Would the expectation be that a larger organization (American Alpine Club maybe ?) would provide organization and direction?

Despite the alarming number of panicked, angry comments from misinformed climbers that you are likely to review, I hope you will be able to filter out that some climbers absolutely care about wilderness and wild places and disagree with the idea that there shouldn't be any accountability from climbers.

Wilderness management is heavily nuanced and often misunderstood, and when fueled by the idea that the 'feds are trying to take climbing away', it shouldn't be surprising that the response to any proposed management is causing a backlash.

On the whole, I think the policy is a workable solution. My concern is that the campaign of lies from the Access Fund will cause you to think that the policy is fundamentally unworkable. I have concerns about the support resources available for the planning process, but I encourage you to move forward with approval of the policy.