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Comments: Dear USFS,

I would like to provide some of my personal insights on the draft climbing management guide issued on November 17, 2023. I will begin by providing a picture of current practice in climbing areas I have witnessed and how they fit in a wilderness context. I will then attempt to illustrate how the climbing management guide could impact those practices. Finally, I will share some additions and changes to the proposal that I think may be more sustainable for the USFS given the available resources.

I have been climbing for over a decade and visited numerous areas both within the United States and overseas. In that time, I have witnessed and taken part in many conservation practices. Bolting is one such practice. Bolting provides climbers a way to interact with vertical rock environment where traditional climbing is not possible with as little impact as possible. In areas where a lack of bolts does not allow climbers access, I have witnessed bark rubbed off trees, trees uprooted, significant erosion, large tangles of permanent knotted nylon, and excessive numbers of access trails to varying points. In areas where I bolts are employed, I have often seen flat, maintained staging areas, clear trails to the base of the cliff, and discrete hardware. I believe that these conditions are correlated. One example of this is rappel stations on alpine routes. On every alpine route I can remember climbing, I have witnessed nylon webbing left behind, weather slung around rocks, trees or bushes, on established climbs or in dangerous areas of loose rock. In my eyes this practice is less sustainable than bolting and is a direct result of bolting prohibition.

The draft climbing management guide has the overarching goal of more hands-on management by the parks service to ensure sustainable practice and minimal impact. An unintentional consequence of this intervention will likely be slowing the process bolting and hardware maintenance. This poses a risk to climbers. Unmaintained hardware is dangerous, and I have witnessed multiple preventable hardware failures, one leading to injury.

The suggestion I have is to make hardware maintenance unrestricted. My interpretation of minimum requirements for administration of wilderness areas necessitates the preventative maintenance of climbing hardware. Putting an artificial administrative barrier to this goes against this idea. To summarize, bolting is a conservation practice which preserves wilderness character and one which is paramount to administering wilderness for the purpose it was established. Impediments to hardware maintenance are counter productive and dangerous.