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Comments: Thank you for protecting and stewarding the land that we enjoy and cherish. This land is a gift to us and one that we want to pass onto future generations. Wilderness in particular is important for our ecosystem and finding solitude.

I appreciate the effort you put into managing and maintaining the climbing routes in these areas. I understand that it is a challenging balance between the many user groups and preserving habitat for wilderness.

As a rock climber who frequents wilderness like Red Rocks, the North Cascades, Joshua Tree and Yosemite to name a few, I want to see sport climbing bolts and fixed anchors installed judiciously, expertly, and only where needed. I see the same intention in the plan for climbing area management laid out in FSM 235.

My primary concern is for the red tape and overhead that the Minimum Requirements Analysis imposes. What will happen to existing anchors if a MRA can't be responded too in a timely manner or at all. How will we continue to replace un safe hardware and conscientiously establish new routes to reduce crowding and give new generations the opportunity to explore? I fear that the number of climbing anchors already installed and likely to be installed far outstrips what can be handled through the MRA process. I did not see any mention of hiring more persons to handle MRA requests and the promise of the necessary funding to do so.

I fear that this proposal will lead to a contraction of existing climbing areas and an increase of unsafe anchors as the number of climbers in the US increasing. This will lead to further erosion and impact on the remaining climbs and an increase in accidents.

For the most elite climbers I fear that this will make their boundary pushing projects more challenging, possibly pushing them into breaking the rules to meet their goals. As first ascensionists are exploring new routes, they need to be empowered to put in safety critical anchors. That said, I know that some routes are not necessary and don't add to overall climbing value of a region or area. I don't think FSM 2355 is the answer though.

Bolting needs stewardship. I see the development of some of the most beloved climbing areas as a communal process of cultivation, growth, and pruning. Guidelines for where and where not to bolt sport climbs as well as fixed anchors have been established in most climbing areas. This culture has been created and maintained by the community. Bolts that deviate from those standards can be removed. I believe that the NPS and Forest Service could best help maintain wilderness climbing areas by working with the local climbing community leaders to inform and guide these efforts. Those bolting within the community ethic should be empowered to make the best decisions in the moment and those who are deviating from it should be informed and discouraged. Money and time could be set aside to remove and restore areas that shouldn't have been bolted. In the end it only takes one person with a hammer drill and some determination to scar a rock face and they will do what they want despite local culture or MRA requirements. That's why I think education and investing labor in replacing unsafe and unnecessary bolts will go further to restore and preserve our wilderness climbing areas than putting an MRA requirement in place that will slow down ethical climbers.

Thank you again for the work you are doing to maintain our wilderness and recreation areas. I hope you will reconsider implementing FSM 2355 as it seems likely to lead to a bolting prohibition throughout the US wilderness areas and all the ills that come with prohibition.