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Comments: I am providing comments regarding the recent climbing management plan to be implemented in Wilderness on USFS and NPS land. I am a climber and steward of public lands and agree that management is necessary to preserve wilderness as climbing increases in popularity. However, I am strongly opposed to the proposed actions regarding bolts, which jeopardize the safety of visitors and erodes the public's access to recreation in wilderness.

The plan proposes to give authority to land managers (e.g. District Ranger) to determine which bolts may be retained in wilderness areas. Climbers already do this, as wilderness is primarily an area for trad routes. There is a strong ethic to only bolt what is necessary, for example on run-out slabs or at the top of a pitch where no natural anchors are possible. Granting staff from land management agencies (LMAs) the authority to decide what equipment may stay or not, or even which equipment may be upgraded or not, can easily lead to a deadly situation. A district ranger or superintendent cannot make these qualified decisions. Climbing is already a dangerous sport and we do not need to increase the risk by allowing non-specialists from LMAs to intervene.

Importantly, the plan takes an unprecedented step to require a Minimum Requirements Analysis (MRA) for installing fixed gear. An MRA is a long and tedious application to complete, requires institutional knowledge to navigate, and once finally submitted, it takes several months to be reviewed and revised. I know from personal experience as I've submitted my own MRA to install a forest monitoring network in Sequoia & Kings Canyon NPs. Director's Order #41 indicates that steps other than an MRA may be used: "Authorization may be issued programmatically within the Wilderness Stewardship Plan or other activity-level plan, or specifically on a case-by-case basis, such as through a permit system". Parks already issue special use permits for installing fixed gear. Requiring an MRA to replace old and precarious bolts for individual climbing routes is unnecessary and presents enough red tape to effectively eliminate this safety practice. To meet the management needs of wilderness, the plan should instead consider amending the special use permits, which involve significantly less overhead for climbers who are literally preventing deaths by replacing decades-old bolts.

I support active management of our public lands so that wilderness and all its features can be enjoyed by generations to come. I sincerely hope that the final climbing management plan includes alternative procedures regarding fixed equipment.