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Comments: The Forest Service should not promulgate the proposed rule (Section 2355).

First, the proposed rule would overburden climbers from enjoying what the federal agencies have determined to be a legitimate recreational activity. The minimum requirement analysis creates too great an administrative obstacle when the agency has not yet identified a legitimate need. While bolts, anchors, and other permanent fixtures may be incompatible with the Wilderness Act, a greater impact analysis of these fixtures should be done by the agency BEFORE a ban or new administrative procedures are required.

Second, the proposed rules are overinclusive. The agency may have a legitimate interest in preventing the overbolting of rock faces, but including all bolts in the definition of "fixed anchors" needlessly puts climber safety at risk. Even for traditional (or "clean") climbing, at least two expansion bolts are often needed to create safe belay and rappell stations. Additionally, sometimes singular expansion bolts are needed to protect a segment of a climb where no traditional protection is available. The climbing community is quite good at self-regulation, and already has a strong ethos to protect our climbing environments and to not needlessly overbold routes. Things like online forums, climbing coalitions, community groups, provide sufficient means for promoting community standards and holding other climbers accountable. Finally, bolts are minimally invasive and very minimally visible, especially from a distance. In my personal experience, hikers, who come in greater numbers and without need for technical or geologic knowledge of the outdoors to partake, pose a much greater risk to maintaining wilderness areas than climbers. Therefore, the agency should identify the impact of bolts and why they need to be regulated to justify the proposed rule that will undoubtedly hinder climbers right to access and enjoy climbing in wilderness areas.

Third, the proposed rules will exacerbate the lack of diversity and inclusivity in outdoor recreation. There is already a large achievement gap when it comes to notable ascents and route development, two major markers of success in the sport, for climbers of color or those with less means. The proposed minimum requirement analysis will further the achievement gap because it will preclude from route development people who do not have access to information, technology, cameras, or even time if they are visiting the U.S. for a limited time.

Finally, there is a strong policy argument against allowing the agency to regulate climbing activities when it has demonstrated such a disappointing lack of understanding regarding the actual impact and needs of climbing in the wilderness. I worry that this is the first step towards many of limiting access to climbing because of a deep misunderstanding about climbing impact and culture. The purpose of public lands is to be enjoyed by the public, with regulation and oversight only to the extent necessary. The agency will lose valuable respect and tourism if the regulations are passed as they stand without demonstrating their necessity.