

Data Submitted (UTC 11): 1/30/2024 6:24:07 PM

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Comments: Before I get into any criticism, I first want to say that I think the idea of including a permitting system for the installation of new bolts and anchors is a much needed change. Climbing shouldn't have some special privilege over other recreational activities in wilderness areas, and the examination of the ecological impact of the installation of new anchors (and perhaps even new areas) is something that most climbers will struggle to interpret. That being said, there are a few worrying points in the draft proposal.

First is operational. A big worry I've heard from many climbers is that permits may get stuck waiting for approval for unreasonable amounts of time. It seems like this time frame will be down to each individual area/park to decide on, and this is worrying in the case of park superintendents with limited resources, as I feel like this could cause unnecessary delays.

Second is the replacement of existing bolts/anchors. While I was a little confused by the language of the draft, it appears that in at least some cases replacement of bolts/anchors requires some sort of permit. This is a big worry since old and rusted bolts pose an immediate threat to climbers. Especially with the popularity of the sport exploding in recent years, a number of newer climbers less familiar with the outdoors may continue to climb on old hardware. Replacement of bolts is something that is time sensitive enough that it really can't be put through a lengthy review. In many cases, local climber coalitions and organizations already have existing reporting and replacement practices that have worked for many years. While I understand the intent of this, especially when new bolt holes have to be drilled, I think ultimately the replacement and upkeep of bolts/anchors has been done well and sustainably for many years without significant NFS oversight, and the introduction of red tape could have the potential to cause injury to climbers forced to climb on old hardware.

Ultimately, I'm not a lawyer, just a concerned climber, so I can't really speak to some of the specifics of the language used. While in general I support the main goals of the draft proposal, some of the specifics need some refining before the policy is fully implemented. I'm sure you've received many comments with many different proposed changes, but at the end of the day our goals are the same: we all want to preserve these sensitive wilderness areas, and minimize any ecological impact the sports we enjoy have on on the land we love.