

Data Submitted (UTC 11): 1/31/2024 12:41:33 AM

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Title:

Comments: I am writing on behalf of the Australian Climbing Association NSW. We represent rock climbers in the state of NSW of Australia. Many climbers aspire to travel to the USA and enjoy adventurous climbing in Wilderness and Forested areas.

We have to date been appreciative of the pragmatic approach to fixed protection for rock climbers in these areas. The move to prohibit fixed protection and label it as an installation is of concern to climbers. Whilst no one should be travelling to Wilderness areas with the expectation of following a line of bolts, many of the classic routes do use bolts for safety for either ascent, or descent. Over 65 000 rock climbing routes will be impacted as estimated by the AccessFund. Fixed protection points if used judiciously reduce the risk of accidents by limiting rock fall, preserve flora by limiting the use of vegetation and can prevent climbers taking descent paths that create erosion or risk ecologically sensitive zones such as canyons.

The existing wilderness policies in the USA seem to prevent a proliferation of bolts, particularly in the determination to avoid motorised drills. Preservation of traditional gear placements and bold climbs seems much more respected in Wilderness areas in the USA than in other areas with large populations such as Europe. This would suggest that existing policy is adequate when it comes to climbing protection, and climbing fixed protection should therefore not be classified as installations.

The suggestion that fixed protection can be managed by MRAs is unlikely to be functional in the real world. It may open the NPS and USFS up to liability and create a bureaucratic nightmare that neither agency will be funded to support, and if they were, then any such funding could be far better spent on other pressing issues.

We would urge the government agencies to amend the proposed draft policies so that fixed protection points for climbing not be considered installations and can be dealt with through existing protection mechanisms.

Many USFS areas need individual approaches and a blanket policy for further route development needs to be developed between local advocacy groups and the USFS. A blanket policy impacting new routes will not work across the country.