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First name: Kevin

Last name: Crum

Organization:

Title:

Comments: I write to you to express concern about the proposal for "Climbing Opportunities #ORMS-3524". My name is Kevin Crum, I am a tax payer, a voter and I have committed my life to climbing for the last 10 years. I have chosen where I live in California and what line of work I do to afford me opportunities to climb in my public lands which include Wilderness and Forest Service land, both areas facing potential threatening proposals to climbing's future. These proposals threaten my ability and right to climb on public lands, by considering fixed hardware as installations and thus needing an mra.

From the beginning of USA's climbing history, climbers have worked really hard with land managers and governing bodies to walk the delicate balance between supporting climbing access in addition to acting as stewards in preserving our natural land in wild places. Climbers work hard to keep wild places wild and this includes famous clean up events that involve climbers cleaning up from other user groups (Yosemite Face Lift). These relationships that climbers have worked so hard to develop and maintain have been working in ways that preserve wilderness character and natural environments. To have a regulation proposal like this come from the top down, this undermines all the collaboration that is already going on in addition to applying a blanket "solution" to non-localized problems that do not exist. I'm all for public land managers working to preserve our public lands however I think they are best addressed when they are in response to issues that are localized to those areas.

Fixed gear is a part of climbing, which is considered a legitimate act at the time the Wilderness Act was passed. I am not legally savvy enough to go into 'congressional intent' however the act never intended for bolts to be considered installations the same way erecting structures or building trails is which is demonstrated by Howard Zahniser, pioneer of the Wilderness Act being one who contributed to fixed gear. I say this not to say hey we climbers want to leave our trash and junk everywhere we go. Far from it, we are a dedicated self policing group who works hard with land managers and take a deep reverence for the land.

An example of me placing fixed gear on a route. I was climbing in a wilderness area in Yosemite as designated by its elevation. The route is a route you rappel in to. Historically climbers have used trees at the top, rappelled down, climbed without fixed gear, and then when they are done they would clean their tree anchors and hike out. This would all be approved by the current new proposal. On caveat. To my horror the two trees that were used were in horrible shape. One tree was dead already and the second was close to dying and it had exposed roots. Around the base of the trunk was damage from the small trunk being used as an anchor. So although this technique did not involve fixed gear, it resulted on a deeper damage to our natural landscape. I hand drilled two bolts made of stainless steel that will safely provide generations of safe passage to the route while also preserving the living tree. These bolts are really far away and you have to get right up to the trees before you would even encounter them. It makes one wonder, what is more important to protect, this idea of pristine rock at the expense of dead trees where a human very may possible die one day from the other trees exposed roots or two absolutely minuscule pieces of rock moved from one part of the earth and placed in another part of the earth.

In addition to the danger of adding stagnation to fixed gear, this ill thought policy can make accidental criminals out of many a climbers. If you are caught in a deadly lightning storm you may need to leave a sling to get home safely and therefore violate the law. Could a land manager witness a few violations like this in their lifetime and as a result close areas to climbing?

Climbers are not looking to go and bolt and change the natural landscape of our public wild areas. We practice ethics of minimal gear and impact. However this proposal does not layout the how MRA process can be funded and evaluated. This is almost impossible to regulate and enforce and to me exists only as a road block and will stand as a de facto bolt ban.

Almost all climbers agree with the 'spirit' of this proposal that intends to preserve wild public places. We show this in our daily lives as I have mentioned before regarding our hard work as environmental stewards in wilderness areas. This proposal is ill thought and misguided however and poses a huge threat to climbing as it exists.