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Comments: I am opposed to the proposed directives for managing climbing in and outside of designated wilderness. These directives are horribly misconceived, at odds with definitions within the Wilderness Act, will lead to increased costs, degradation of resources, unnecessarily constrain the use and access to a recognized and legitimate use of public land, expose climbers to increased danger/risk, and impose an untenable unfunded mandate on both the Forest Service and Park Service. The language of the proposed directives reflects a complete lack of understanding and expertise related to climbing within the drafters' competence and will lead to disastrous (and at times fatal) outcomes and reduced access to a significantly growing recreation group.

The proposed rules will promote diminished safety in all wilderness and non-wilderness climbing by restricting maintenance of bolts and other anchors (as well as placement of new anchors). Most/many climbing accidents occur on the descent. Failure to support maintenance or of existing anchors or placement of new bolts/anchors (without long bureaucratic processes) will expose climbers to unnecessary risk/danger. Ironically, this is completely at odds with the emphasis the new rules place on "assumption of risk" and other clear attempts to limit forest service and park service liability exposure.

Rather than leading to degradation of resources, the placement of bolts mitigates resource degradation since climbers will use these virtually unnoticeable means of descent rather than slinging trees and other vegetation for creating anchors. Creating established legitimate bolted anchors also funnels climbers into established lanes where rock fall and resource damage are less likely to occur.

The proposed rules which unnecessarily constrain use of bolts will lead to increased costs associated with search and rescue operations as climbers' descents become more dangerous. Descending is already the most dangerous part of the activity and exposing climbers to utilizing aging and substandard anchors will gravely increase the frequency of accidents and costs to search and rescue operators.

Climbing has become a huge boon and major economic driver to many local communities. Restricting use of bolts/anchors and development of rock climbing opportunities will put a stranglehold on those many local communities with economies that are driven by climbing and other associated recreation. Climbers are exceedingly (and by reputation) low impact users, LNT to the core, and respectful of the environments in which they recreate.

Unlike trails, impacted campsites, hunters'/outfitters' semi-permanent camps, bolts and anchors are virtually impossible to see or recognize unless you are hundreds of feet above the ground. They literally create no visual impact for other users. Bolts and "fixed anchors" should not be considered installations within the meaning of the Wilderness Act. They are, on the other hand, essential to the use and enjoyment of public land for a hugely growing and legitimate user group--rock climbers!

Climbing has been a widely and recognized means of recreating on public lands for many decades (including prior to the Wilderness Act) and is a growing means of enjoying our public lands. If Congress had intended to include bolts/anchors as permanent prohibited installations, it would have characterized them as such. Given that they are virtually unnoticeable to anyone but the user they cannot be included/defined as permanent installations.

The proposed rules amount to 1) an unfunded mandate for land managers to regulate climbing; and 2) a de facto ban on development of climbing and maintenance of critical climbing bolts/anchors necessary for safety. Layering costly assessments, processes, and hurdles amount to an arbitrary and capricious penalty/outcome for all climbers and adjacent local economies.