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Comments: As a newer climber, the sport has presented me with a new opportunity to experience wilderness areas near my hometown in Southern Arizona, build a stronger connection to natural places and a sense of stewardship. The active and dedicated climbing community who maintains the bolts in the areas I frequent is critical to my perceived and actual safety. Safety is a central element to climbing, and one that's particularly important for supporting the next generation of climbers, including communities who have been traditionally underrepresented in the sport.

I appreciate the USFS's efforts to further protect our natural and wildspaces and improve management of areas used for climbing, however, the proposed new guidance would function as a prohibition on climbing in many existing areas and decrease safety for climbers. I strongly urge USFS to reconsider these guidelines, and continue to allow climbers to quickly maintain fixed anchors and other hardware without time-consuming and prohibitive permitting processes.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

New and replacement fixed anchors may only be allowed after a Minimum Requirements Analysis (MRA) for prohibited uses. This new exception process will clearly limit fixed anchor authorizations and restrict the ability of climbers to make in-the-moment safety decisions. Every MRA decision document will open up the agency to litigation and the process adds an unnecessary bureaucratic step for managing sustainable climbing. Further adding to the bureaucratic hurdles, land agencies do not have the resources to implement this unfunded mandate. The guidance requires that land managers must develop climbing management plans (CMPs), or other relevant plans, for each federal land unit. There are currently very few CMPs in national parks and forests, and the agencies lack the funding and resources to complete such plans. Understaffed and underfunded public land managers would be responsible for executing complex and resource-intensive requirements when they already have the authority to effectively manage climbing in wilderness. This will present a barrier to maintaining existing and long-utilized climbing routes to ensure safety.

Wilderness areas still allow for many uses, including activities with significant impacts on ecosystems, such as mining and logging in primitive areas. Comparatively, climbing's impacts are minimal and serve as an important pathway to the outdoors for a new generation of environmental stewards, and advocates for the protection of our national public lands.

The Southern Arizona climbing community has a long and positive history on National Forest system lands in the region. As such, rock climbing is a well-accepted and celebrated activity on the Coronado National Forest (CNF), as well as National Parks across the country, with routes established well before the 1964 Wilderness Act. The CNF even celebrates rock climbing on its homepage as a major forest activity. Southern Arizona is also a renowned national climbing destination. The proposed changes would jeopardize this history and climbing legacy, with detrimental impacts to the Southern Arizona climbing community, and our local outdoor economy.

There is an inherent tension with the need to protect human recreation, especially one that involves the

installation of infrastructure in natural areas, and the imperative to protect natural ecosystems from humans' ubiquitous and lasting impact. The lasting legacy of the Wilderness Act is the protection of natural spaces for their sake, and not solely for human use. I call upon USFS to work with the National Park Service to adjust the proposed guidance in a way that seeks to balance the need for safe, climbing spaces to cultivate the next generation of public lands stewards, and the protection of the lands themselves. I urge USFS to work closely with local climbing organizations and nonprofits, especially those that facilitate the inclusion of women and people of color in this growing sport, to identify new policy approaches that protect these important places and outdoor climbing.

Thank you for your time and consideration,

Elena Ortiz