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Comments: I am writing to express my strong opposition to the proposed restriction on establishing new routes to "existing climbing opportunities" on non-Wilderness lands. This approach is not only unenforceable, but it also creates confusion and limits access for responsible climbers. Instead, non-Wilderness climbing management policy should maintain opportunities for new anchors while ensuring the protection of cultural and natural resources through data-driven decision-making.

Here's why the proposed restriction is problematic:

**Unenforceable:** Defining "existing climbing opportunities" is ambiguous and subjective. What constitutes an "existing" opportunity? Does it require formal documentation, historical records, or simply anecdotal evidence? This vagueness will lead to inconsistencies and disputes, making enforcement impractical.

**Confusing:** Land managers and climbers will face ongoing uncertainty regarding the permissibility of new routes. This ambiguity discourages exploration and innovation, hindering the growth of the sport and limiting access to unique climbing experiences.

**Unnecessary barrier:** Responsible climbers understand the importance of respecting the environment and minimizing impact. Imposing blanket restrictions stifles responsible exploration and unfairly penalizes responsible climbers, while potentially pushing less informed individuals towards irresponsible development.

A better approach:

Instead of this restrictive approach, I urge you to implement the following:

**Data-driven decision-making:** Conduct thorough environmental and cultural resource assessments before restricting climbing activities in specific areas. This ensures decisions are based on objective evidence, not arbitrary limitations.

**Focus on education and stewardship:** Encourage responsible climbing practices through education and outreach programs. Empower climbers to be stewards of the land, promoting minimal impact and respect for sensitive areas.

**Collaborative approach:** Work with climbers, land managers, and conservation groups to develop clear and enforceable guidelines for responsible route development. This fosters transparency, understanding, and cooperation.

**Conclusion:**

Restricting new routes on non-Wilderness lands is a counterproductive approach that creates more problems than it solves. By fostering responsible climbing practices through education, collaboration, and data-driven decision-making, we can ensure access to new climbing opportunities while protecting our valuable natural and cultural resources.

Thank you for your consideration.

Sincerely,  
Jeremiah