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Comments: I am a strong proponent for environmental preservation. I am grateful to see that the proposal recognizes that climbing is an appropriate use of NFS lands including wilderness. I believe that protocol can be an effective measure to preserve wilderness; however, the proposed directive, while well intentioned, will have a drastic negative effect on public safety which cannot be ignored.

The specific issue is with the wording of the section "that existing fixed anchors and fixed equipment in wilderness may be retained pending completion of a Minimum Requirements Analysis, as funding and resources allow, that determines they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character." Specifying that existing fixed anchors and equipment may only be retained pending a completion of an MRA by default renders all fixed gear illegal, as at the initial adoption of the rule no MRA will have been conducted. At best, all current climbing routes will exist within a legal limbo, of which the future could change at any point. This legal limbo will create a chilling effect on the cooperation of the climbing community with the NFS, as drawing additional attention to the existence of routes will potentially jeopardize their existence. This chilling effect will discourage climb maintainers from seeking approval for replacing faulty or dangerous anchors for risk of an MRA determining that the climb does not meet the minimum requirements. In many cases the risk of unfavorable MRA will discourage maintenance at all, leading to a dangerous patchwork of unmaintained gear with a whisper network of climbers only partially aware of what is and is not safe to attempt.

The public safety impact cannot be understated. The proposed rule will lead to greater gear failures, more accidents, more injuries, and more deaths. The impact will be felt mostly in the less experienced population as they will lack the necessary inside information to judge the safety of climbs. I strongly urge the NFS to reconsider the wording of this provision to reduce the disastrous health and safety impacts this will have on the casual climbing community.