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Comments: The proposed rules unfairly restrict a valid and authorized recreational use of public lands. This process is unnecessary as existing planning processes already capture management of recreational uses on Forest Service and National Park lands. Land Management Plans are already required to be prepared to capture how specific forest districts or national park lands shall be managed, including what recreational uses are appropriate for each management area. This additional action unfairly targets rock climbing activity and is wholly unnecessary to protect natural resources. Sparse federal resources should be used for actions that are truly necessary for the successful management of these lands (acquisition, restoration, etc.).

Wilderness versus Non-Wilderness

The proposed rule/process is confusing as it mixes the management of wilderness versus non-wilderness into the scope of the effort. Please remove non-wilderness from the proposed action as these lands are more broadly managed and allow for more uses. Focusing the effort on designated wilderness meets the intent of the legislative request.

Causes Safety Issues

Removal of fixed climbing anchors creates a safety issue, potentially contributing to costly rescues and climber injury/death. Bolts installed on rock formations enable both the safe ascent and descent of rock climbers.

Anchors are placed at the top of climbs to enable a climber to descend and are often the only way for a person to safely get off the rock formation or return to the ground. Removal of these bolts/anchors would eliminate the ability for the public to rock climb and could endanger the public by removing the only safe way to access and use the rock faces.

Inappropriately and Retroactively Applies to Existing Conditions and Historical Uses

This action inappropriately seeks to severely impair the public's ability to continue accessing, visiting, and recreating in areas that have authorized this use and allowed rock climbing for decades. New rules that are applied looking forward after consultation and engagement with the public are appropriate. Retroactive application of restrictive installation rules and climbing restrictions to historically used recreational sites is inappropriately applying the wilderness act provisions to uses that are allowed and have been found to be compatible with natural resource protection. Across the County, areas have been designed as wilderness allowing existing recreational activities to continue. Lands designated as wilderness have not eliminated all human alteration of the landscape nor have all wilderness areas sought to eliminate all human impact.

Retroactive application to previously allowable and permissible uses is a serious infringement on the public's right to access and contrary to the intent and guiding principles of National Forest Service and National Park Service.

Rock Climbing is a Recognized and Allowable Use

National Parks and National Forests already have required Land Management plans, resource management plans or recreation plans (including climbing management plans) that substantiate rock climbing as a valid, legal, and permissible activity on these lands. Rock climbing is vertical hiking, much like how trails are allowed for hikers, runners, etc, the rock formations have been used for vertical hiking without significant impact on the environment.

Bolts/Fixed Anchors Do NOT Cause a Significant Impact to Resources

Bolts and hangers are very small and are often not visible from a distance. The installation of bolts and presence of bolts on the rock does not significantly alter the rock or damage the environment. Picture of bolt hanger on rock face.

<https://i.ytimg.com/vi/ckriqAAAdOWs/maxresdefault.jpg>

Subjectivity of Application and Interpretation of Rule

Allowing decisions to be made at the discretion of decision Forest Supervisor allows for bias and inconsistently in application. Given the subjectivity of any one individual, there must be a process for appeal.

Rock Climbing Activities Unfairly Targeted

Other recreational uses are not being treated the same. Although many other recreational uses also require some sort of installation (road, trail, fence, posts, benches, signs, etc.) those are not being addressed. Rock climbing is being unfairly targeted with an action that could eliminate the ability for the public to climb in hundreds of areas across the county. If updates are needed to how NFS and NPS lands are managed, these should be looked at holistically to evaluate how ALL recreational uses may affect the resources, not just rock climbing.