

Data Submitted (UTC 11): 1/31/2024 3:38:54 AM

First name: Tracy

Last name: Melville

Organization:

Title:

Comments: Climbing is a relatively low-impact form of recreation that has been occurring in wilderness areas for over 50 years. The climbing community as a whole tends to be a community that values following leave no trace ethics in order to preserve climbing areas, and there are many routes in wilderness areas that are iconic and have been in place for many, many years.

Bolted anchors are an essential to keep most climbing routes safe, including on many "traditional" climbing routes where pitches between anchors are climbed by placing removable hardware (cams, nuts, etc.). Bolted anchors make retreating/rappelling from routes much safer, and in many cases it is not possible to return to the ground without them. They are also small, not easily visible from a distance, and in wilderness areas are drilled using hand drills, which limits the amount of new routes that can feasibly be put up in these areas.

The new proposed regulations of climbing would greatly reduce safety by limited/prohibiting the replacement of existing bolts in wilderness areas, putting lives at risk as bolts age and become less safe for use in climbing. They would also penalize people in the climbing community who chose to replace existing bolts that are unsafe and pose immediate hazards, and slow down or stop the process of replacing unsafe hardware, thus putting lives at risk.

These regulations would greatly limit access to spectacular areas of wilderness that are only accessible to the public via climbing routes with fixed anchors. They would also put an undue burden on land agencies to enforce and draft complicated Climbing Management Plans and remove hardware that does not meet requirements for the new regulations.

It would be better to allow individual land agencies (specific national forests, etc.) to draft rules regarding climbing hardware that best fits the individual area and its resources as well as the unique ethic of the area regarding climbing, instead of imposing blanket regulations for all wilderness areas that don't necessarily match well with the resources of the agency to enforce rules and process MRAs (thus putting lives at risk). For example, some land agencies might choose to impose limits on fixed hardware in wilderness areas if they deemed it necessary for conservation of the wilderness ethic of that area, but other land agencies in locations where climbing is very important to the community and recreational access might choose to impose fewer limitations. For example, in the Pirsch Wilderness in Coronado National Forest in Arizona, off-trail travel for climbing or other activities is allowed in the wilderness area from May 1st-December 31st, and closed in the spring to reduce impacts to bighorn sheep reproduction. This effectively closes many routes in the wilderness during the spring, and the climbing community respects and follows these regulations, which meet the specific conservation goals of the land agency in question. This allows for a good relationship between the climbing community and the national forest and allows for preservation of bighorn sheep habitat while also allowing climbers the opportunity to explore many unique climbing opportunities in beautiful areas while responsibly recreating in the Pirsch Wilderness.

This is an example of an agency choosing regulations that it has the capacity to enforce, without putting lives at risk or greatly reducing the access of the very active climbing community in the area to beautiful and unique routes in the Pirsch Wilderness, including Void of Form, a well-known, 10-pitch route that is one of the tallest routes in the state.

Thanks.