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First name: Brendan

Last name: Scobie

Organization:

Title:

Comments: To the USFS,

Please do not implement FSM 2355 Climbing Opportunities as described. It should at least be amended to allow the maintenance of existing routes, since these will become unsafe over time, and it is unlikely that climbers will stop using them until there is a serious accident. Furthermore, the regulation should be targeted at areas of natural beauty where local climbing organizations do not cooperate with land management agencies or take care to preserve natural beauty.

In the city of Tucson, where I principally climb, the abundance of rock climbing routes in the nearby Santa Catalina Mountains is the main reason that many residents use Forest Service land for recreation. This leads to an appreciation for the land and a stake in its preservation, and the climbing community in Tucson and Southern Arizona has demonstrated a pattern of organized and responsible stewardship of these climbing route. Established climbing routes are also used for mountain rescue, trail maintenance, and wildlife research.

Particularly in Tucson, there would be a nontrivial economic impact if climbing routes became inaccessible or unsafe. The city hosts three climbing gyms, and many businesses at the base of the Catalina highway cater toward rock climbers. A component of the city's tourism revenue is linked to rock climbing, and this would be adversely affected by the regulation.