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Comments: Dear Forest Service,

I appreciate the opportunity to comment on the "Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Area" draft, and do not take this opportunity for granted. I am born and raised in Tucson, AZ, a town that has been voted one of the best climbing cities in the US. Though I'm from here, I've lived many other places in the western US and climbed all over the county on National Forest, National Parks, and other US public land divisions. It is the climbing and outdoor recreation access that makes Tucson the place it is. Just last weekend I rode my bike from town, loaded with climbing gear and climbed in the Coronado National forest (Mt. Lemmon). There are not many areas where this is possible, especially in January. The area I climbed at was one I had developed 8 years prior, and now offers climbers easy access climbing just off Catalina Highway.

Having looked at the draft management plan, I am concerned about the impact it will have on climbers who rely on bolts for their safety. As you know, climbing is a historical use of public lands, and in more recent times, climbing organizations have been one of the few groups rallying to maintain public trails that all users benefit from. Disallowing the maintenance and replacement of existing bolts in wilderness without a lengthy review process means climbers might wait months or years to repair damaged equipment, leaving people to trust questionable equipment with their lives. The classification of these as prohibited installations goes against the long standing knowledge of bolts as necessary safety equipment to be used sparingly in wilderness areas. Another concern with the draft is the management of existing climbing areas within the wilderness, which instead of potentially being removed, should be preserved as a valuable and valid wilderness experience. Furthermore, the need to submit for approval any new routes that might include bolts disallows the exact wilderness experience of climbing ground up in remote areas, using natural protection and placing bolts when necessary for protection in the moment. Climbing is a legitimate and storied use of our public lands, and its regulation should continue as it has for many decades, allowing climbers to practice their sport safely, with as minimal impact to the land as possible.

Finally, I am concerned about the burden this proposal puts on existing forest service officials, who already have to contend with limited resources and inadequate staffing. If this is accepted, there must be additional positions added to make the approval process for bolts one that is enforced and efficient. Without these significant resource increases, the proposal leaves local offices unable to act on these newly created top-down rules, and the safety of climbers hangs in the balance.

I hope these comments and the comments of many others are heard and have an impact on this proposal which risks changing the character of American climbing, simultaneously disabling climbers from maintaining existing routes and adding new ones.

Thank you for your consideration.