

January 29, 2024

The Southeast Wyoming Climbers Coalition (SEWYCC) is writing to express our general support for the proposed guidance on fixed anchors. We are asking for clarification on a few points and would like to offer additional language on bolting procedures to protect climbing opportunities on National Forest System lands.

In December 2019, SEWYCC coalesced to ensure that climbers' voices were heard during a public input process on the Medicine Bow-Routt National Forest. A chain of emails amongst a loose network of climbers led to an initial meeting of just eight people. Four years later, we have over 120 members and are still engaging with the local ranger district to advocate for non-motorized recreation. Our mission is to be the unified voice of climbers in our region, but we represent a community that travels across the nation and around the world seeking wild places to climb. Our organization values Access, Cooperation, Inclusivity, Stewardship, and Sustainability and we view commenting on the proposed guidance as an opportunity to enact these values and protect climbing resources for generations to come.

We strongly agree with the intent of the guidance, which is to preserve the wild nature of climbing on National Forests--wilderness or not. Collectively, we have climbed on every rock type and in every conceivable type of climbing area ranging from highly developed areas, such as parts of Joshua Tree, to extremely remote areas, like Gannett Peak in the heart of the Bridger Wilderness. We think that climbing management decisions must largely take place at the district or unit level, but appreciate the attempt to build "guardrails" that will create a standardized process across the country. Local Climbing Organizations (LCOs) are poised to help forest leaders develop climbing management plans by providing extensive knowledge of existing climbing opportunities, familiarity with best practices in maintaining and developing climbing resources, and established relationships with climbers in our local communities.

We are concerned by some of the language in the proposed guidance and ask that you address the following issues:

**Problem:** National climbing organizations are concerned that the current guidance places a de facto ban on both placing and re-placing fixed anchors until extensive analysis has been performed, without providing additional resources to do said analysis. Prohibiting bolt replacement creates safety hazards for climbers.

**Solution:** The American Safe Climbing Association advocates for one-for-one bolt replacement as best practice in replacing unsafe hardware. We advocate for a provision that allows the replacement of existing fixed anchors in a one-for-one manner *without* a MRA or other analysis. This will allow dangerous hardware to continue to be replaced in a timely fashion while route inventories and climbing management plans are completed.

**Problem:** Removing existing fixed anchors, particularly on descent routes, and prohibiting new anchor installations will lead to resource degradation and congestion.

**Solution:** Allow fixed hardware replacement and additions in wilderness and non-wilderness areas to protect the wild places and increase climber safety margins. Bolted and fixed rappel stations prevent resource degradation in delicate environments by directing climbers to a single exit location. This reduces dangerous rockfall hazards that occur when climbers descend the route they climbed, minimizes social trails, reduces erosion, and limits proliferation of fixed anchors due to self rescue scenarios.

**Problem:** Allowing individual districts or units to create their own process for permitting bolting and replacing hardware will lead to a patchwork of approaches and create conflict between land managers and climbers.

**Solution:** Guidelines for when a permit is needed should be established at the federal level. The permit process should be: digital, standardized, and streamlined. This will allow LCOs and national climbing organizations to standardize stewardship of climbing opportunities. A uniform approach across forests would allow LCOs to share resources and help bear the burden of managing climbing opportunities.

**Problem:** Appropriate use of motorized rock drills for non-wilderness climbing has not been clearly established (2355.31). This allows for possible inappropriate use including chipping hand and foot holds through mechanized manipulation of the rock.

**Solution:** Prohibit manufacturing hand and foot holds for all climbing opportunities (as in 2355.32).

In summary, SEWYCC would like to reiterate our support for preserving the “primitive and unconfined recreation” found in iconic climbing opportunities across forest lands. We appreciate the enormous effort that has gone into crafting the proposed guidance that protects both our sport, wild places, and the cultural and historic significance of climbing around the country. Our sport is growing and we want future generations to be able to experience the climbing opportunities that we have long enjoyed. Rather than management that focuses on restricting the hardware, we advocate for exploring strategies for managing the people themselves. We look forward to collaborating with land managers to find creative solutions for sustainable climbing management.

Respectfully,

**Southeast Wyoming Climbers Coalition**

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