

Data Submitted (UTC 11): 1/31/2024 1:16:50 AM

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Comments: Illinois Climbers Association is a 501(c)(3) nonprofit organization representing the climbers of Illinois. We are dedicated to preserving climbing and bouldering access in Illinois through education, conservation, and cooperation. There are thousands of climbers who live in and visit Illinois to recreate. The largest quantity of existing climbing resources in the state exist within the Shawnee National Forest. Illinois Climbers Association (ICA) values and recognizes the importance of both recreation and conservation on public lands and we are committed to working with land managers to appropriately manage use and steward the climbing resource. In the spirit of our partnership with the Forest Service, we would like to offer our comments on the proposed policy "FSM 2355 Climbing Opportunities #ORMS-3524."

ICA has a long and positive relationship working with the Shawnee National Forest under various agreements and annual plans. Most notably we work under a Challenge Cost Share agreement to maintain and replace fixed anchors at Jackson Falls. Under this agreement ICA proactively works to replace existing fixed anchors that are nearing the end of their safe lifespan, some that were placed many decades ago. This is no small task. We solicit and receive information from the climbing community regarding the perceived safety of existing anchors. When needed and appropriate, we perform the task of removing and replacing anchors. This is physical labor that demands a high degree of technical knowledge regarding rope access and safety systems, knowledge of bolting hardware types, strengths and limitations given particular rock types and more. The ICA has extensive knowledge and experience within its members and board of directors collectively, which warrants its expertise and ability to perform these activities. In the past decade, ICA has replaced many hundreds of anchors. Through this work in the Shawnee and other areas, we have demonstrated our commitment and expertise in managing and maintaining climbing areas including the use and installation of fixed anchors.

Climbing has expanded in the past few decades. While we recognize the need to adopt a plan that addresses climbing, we are concerned with the language of the policy in some areas. FSM 2355.21 calls for development of a climbing management plan "as funding and resources allow," but without earmarked funding and no specified deadline, what should happen in the interim? Plans take years to develop, in which previously existing fixed anchors needing replacement may persist causing safety concerns. Anchor replacement work should be allowed to continue without restriction, and this should be added to the language of the proposal.

The Minimum Requirement Analysis proposed for Wilderness Areas in 2355.32 is concerning for similar reasons, given no additional funding is earmarked to aid in the adoption of this proposal. We are concerned this policy may have a trickle down effect and be adopted into non-wilderness area climbing management plans, as the most efficient way for local areas to develop management plans would be to adapt currently existing plans. The Minimum Requirement Analysis (MRA) burdens taxpayer funded time and labor resources. The decision regarding which anchors are necessary for climbers' safety, which need replacement and which are unnecessary thus should be removed are very nuanced decisions. These nuanced decisions are difficult even for those who have extensive knowledge and years of experience in the field of fixed anchor management. The ICA is highly concerned that the MRA is an impractical and inefficient policy that has potential for harm by inhibiting fixed anchor management in areas where climbing is a valid recreational use for enjoyment on our collective public lands.

Thank you for your time in reading and considering our comments.