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Comments: Our club is pleased to see the USFS taking a more concrete interest in climbing and making sure that climbing anchors are used appropriately. However, we have concerns about the proposal.

First, and most importantly, is the outreach (or lack thereof) that the USFS has done for this proposal. As a small climbing club focused on climbing in the Pacific Northwest, we understand we are not known nationally, but when we weren't notified about the Cascades permitting proposal, we contacted our USFS office directly to request to be notified about any future climbing related proposals. Disappointingly, we weren't contacted for this. We would give the benefit of the doubt to the USFS that we are on a list specific to the Cascades project, not on the list for this national project, but since that local office knows about this proposal and to notify us for climbing related proposals, we see this as a failure. Furthermore, the media channels we ended up seeing the proposal through were alarmist. We don't believe that to be fair, and we expect many of the comments received will be unnecessarily confrontational due to the USFS's poor public outreach and messaging. The design of the sites to read the proposals and submit responses are difficult to navigate. The title on this webpage, for instance, isn't meaningful to the general public. "Climbing opportunities" wasn't the term used in the media coverage, and not until the second paragraph is there a summary explaining what it even means. Confusingly, there are multiple pages to give feedback. When verifying the website with a fellow climber, we had different pages that were both correct, but different, leading to confusion. We'd suggest future titles be in layman's terms and the subtitles referring to the regulation numbers (with links immediately available instead of buried in text). Even the summary provided includes references to regulations that aren't explained, making it hard to read and understand. We hope that the newly passed congressional legislation requiring 100 word summaries for all new regulations applies to all future USFS regulations, but if it doesn't, suggest following it anyways. Expecting the public to understand proposed regulations and the process they go through, without doing outreach the USFS knows is required to help the public understand even basic, unchanging regulations that have long outreach history, such as leave no trace, is difficult to excuse. Lastly, no examples were given about the expected impacts of this proposal. Voter pamphlets for proposed laws are accompanied by expected outcomes, costs, methods of enforcement, etc. because the public needs to understand what they're voting on, and that has not been done here.

Next, while our club agrees that climbing route anchors should be managed by the USFS on forest service land, particularly in wilderness areas, we are concerned about the anchors at the top of routes used for descending. Our club mainly climbs peaks that do not have permanent anchors. Rather than relying on bolts or chains, slings are left around pinnacle blocks for rappelling down, and those are not clearly addressed in this proposal. They are not permanent, but they are left behind. They are generally referred to as anchors, and do not comply with leave no trace principles. We make it a policy to remove tat, and feel leaving slings is the most practical, safest solution for rappel anchors in these areas. Even if someone were willing to place permanent anchor bolts with chains, most of the rock on mountain tops are very weathered, go through extreme freeze/thaw cycling each year, and attract lightning, all of which could quickly cause safety issues. If the USFS considers these types of left behind sling rappel anchors as temporary anchors in 6(a), that should be clarified. Or if there is a different practice the USFS expects, a risk assessment should be performed and the outcome should be communicated to the climbing community. We know leaving slings is typical as we clean many old slings on our climbs. In our experience, other systems in high alpine environments with lots of loose rock, such as retrieving slings using a tagline, are dangerous due to the risk of dislodging rocks, particularly on heavily climbed routes during busy windows, and more often results in things getting caught, increasing risk for all present.

Third, we're concerned that whatever plan is developed and passed will not be easy to understand and to communicate. We'd prefer to see the same rules applied across formations and areas, instead of differing by route, and that those rules be simple, with only a few general types of rules with few (and only obvious) exceptions, so that climbers can go to different areas and climb without having to research nuances. Ideally, a rule for an area would be able to be summarized in a short sentence.

Fourth, we want the expectations for incidental, non-conforming anchors to be made clear. We generally aren't involved in developing routes or otherwise maintaining or installing bolts or other permanent anchors, which seems to be the main intention of these regulations, but that isn't expressly stated. Our concerns are about the temporary anchors we normally use to climb getting stuck or otherwise needing to be left behind (such as if we need to bail). If we need to do something, we want this to be spelled out clearly. Obviously we don't aim to bail or have gear get stuck, but it is a reality of the sport and needs to be planned for.

Thanks and we look forward to the results of this process.