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Title:

Comments: Dear USDA Forest Service,

The Allied Climbers of San Diego and Mesa Rim Climbing Centers appreciate the opportunity to provide comments on the "Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness".

Allied Climbers of San Diego is a local climbing organization (LCO) that works closely with the Access Fund to advocate for environmentally responsible recreation of climbing activities in San Diego, California and surrounding areas. Mesa Rim Climbing Centers is one of the largest climbing gym organizations in the US and reaches over 100,000 people nationwide in Nevada, Texas, and California. As climbers, we place a high value on preserving the environment for future generations and protecting wildlife, natural, and cultural resources.

Climbing is an activity that relies highly on self-reliance, and allows people to experience wilderness in a way that you cannot by walking on a trail. Climbing aligns with the goals of the wilderness act of 1964 as it does allow for "solitude or a primitive and unconfined type of recreation". We would like to share why having fixed gear is not incompatible with wilderness areas, and how prohibiting the installation and replacement of fixed gear can actually lead to more degradation of fragile environments.

Having safe, well maintained, and strategically placed fixed gear actually reduces impact. This is analogous to having designated trails, which are used in wilderness areas to reduce impact. Having fewer, well marked, designated trails prevents others from making many social trails that would degrade a habitat. Bolts and fixed rappel stations prevent resource degradation in fragile alpine environments. Prohibiting fixed anchors encourages climbers to rappel off of trees and bushes, which can eventually kill cliffside vegetation. Bolted anchors reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location to rappel, rather than a convoluted descent.

Rappelling is the primary cause of death in climbing accidents. When climbers rappel, they rely on an anchor, and anchor failure during rappelling often results in death. Prohibiting the maintenance of anchors or placing bolted anchors increases the risk of anchor failure. This would increase demand on already overworked volunteer Search and Rescue (SAR) organizations and greatly increase the risk of severe or fatal climbing accidents. Restricting the replacement of existing bolts, or the addition of new bolts, would create even more demand on SAR. Rappelling off of bolts or fixed anchors is often the only option for climbers to

self-rescue before activating SAR resources. The proposed directives would prevent climbers from safely retreating from routes without SAR rescue, for example during inclement weather.

The new directives will make existing routes more hazardous by discouraging maintenance of bolts and anchors. Fixed gear often needs to be replaced every couple of decades. Without the ability to leave behind equipment or modify existing slings or pitons, climbers will be encouraged to trust the existing gear left exposed to weather over the years. Aging hardware makes climbing routes and descents less safe, which causes more accidents.

While the plan does outline a path for getting fixed gear approved, the path to approval is many steps long. This will not only tie up limited time and bandwidth of NPS personnel, but create impractical, long, delays in replacing unsafe fixed gear. Additionally, existing responsible user groups will often be at the mercy of a single land manager. This excessively long process for approval will compromise the safety of wilderness users.

The Wilderness Act of 1964 states that wilderness areas are to "generally appear to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable". Bolts are small (less than 3" in diameter) and often placed far from any areas non-climbers would be, such as high off the ground. Bolts are generally unnoticeable to other users. Many existing organizations and climbers already implement measures to minimize the visibility and impact of fixed gear. For example, In the Wind River Range (Shoshone National Forest) climbers are encouraged to only leave behind gray, rock colored slings, and to clean up any old slings left behind. Many climbs have bolts that are painted, and even texturised, to match the color of the rock. The American Safe Climbing Association (ASCA) gives out 1/2" bolts, which last decades longer than sometimes used 3/8" bolts. We would like to encourage NPS to work with existing climbing organizations (Access Fund, ASCA, LCOs) to promote education and best practices about fixed gear that balance responsible recreation and wilderness area preservation. Fixed gear and wilderness are not incompatible.

Climbers are well-versed in the practices of mitigating impacts to vegetation, cultural sites and sensitive species. Most areas in the United States with climbing nearby have Local Climbing Organizations that do work closely with their land manager to recreate responsibly. For example, Allied Climbers of San Diego works closely with Cleveland National Forest (through Lee Hamm, the Recreation & Land Officer) to ensure that climbing activities do not disturb raptor nesting. This collaboration has been successful not only to allow for responsible recreation on

USFS land, but also reduces the workload of the personnel by having members of our organization monitor raptor activity. We would like to encourage the NPS to work with LCOs as well as national groups such as Access Fund, ASCS, and large climbing gyms to develop ways that allow climbers and other user groups to recreate unconstrained wilderness areas while remaining primarily shaped by nature.

Ultimately, because climbing is very low impact, and climbing groups already care deeply about the long term ability of everyone to enjoy the beauty of our outdoor spaces in their natural condition, the climbing community is one of the best advocacy groups for preservation in Wilderness areas. We can work together to ensure long term preservation through low impact use, and to ensure public support for our outdoor spaces remains high. Climbing gyms offer many programs that educate outdoor users to experience the outdoors safely and minimize impact. Working together to preserve the wilderness while allowing responsible recreation will be more effective than blanket prohibitions.

Thank you for taking the time to read our comments. We look forward to working with the National Park Service to steward these important resources for generations in our local climbing area in the future, and know that there are many local climbing organizations that share the same perspective and values.

Sincerely,
Chris Naso