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First name: Melissa

Last name: Kochanowsky

Organization:

Title:

Comments: I started sport climbing outdoors during my freshman year of college in 2017. Having grown up in the city my entire life, outdoor climbing was my first true exposure to wilderness (and non-wilderness areas).

Through outdoor climbing, I found health and fitness, community, and even my husband.

Outdoor climbing also exposed me to the amazing local climber coalitions that help steward and protect natural areas, which provided me crucial education and inspiration to get involved in local community-driven activities like building and repairing sustainable climber trails.

I was a part of the recent rapid growth of climbing. I think climbing should be managed, especially with that rapid growth of the sport in recent years. However, the National Forest Service policy produces an inefficient and unenforceable approach to management, especially in lieu of the decades-old, positive local examples of climbing management in areas like my home crag, the Red River Gorge, Kentucky (aka "the Red").

The Red maintains climbing areas on both private and National Forest land. The National Forest service in the area have allowed for the existing fixed anchors to remain, and our local climbing coalition and developers have maintained a trusting relationship with the local Forest Service personnel to assess and request to replace fixed anchors when deemed unsafe. Local climbing developers even took the initiative to help steward a website (badbolts.com) that provides a forum for formal reporting of unsafe anchors on behalf of local climbers.

That being said, the replacement of unsafe fixed anchors on the private, climber coalition-owned properties in the Red can be a far more speedy and conscientious process. Local developers are able to replace bad fixed anchors within the same day they are reported. Not to mention, the enabled speedier response of developers to replace fixed anchors reduced the likelihood of people without proper skills and knowledge from attempting to replace the anchors themselves and potentially causing more harm and degradation to the natural qualities of the rock.

In a world-famous climbing area like the Red that has tens of thousands of visitors every year (not unlike climbing areas on NFS Land, including both wilderness and non-wilderness) each day that passes that an unsafe fixed anchor is not replaced poses an exponential risk that a serious, potentially deadly accident will occur. And the risk that a climber, out of extreme necessity for their safety, replaces the fixed anchor using methods that increase environmental impact.

It is disconcerting to think how the more arduous process for fixed anchor replacement resulting from this policy could yield more accidents and more environmental impact due to unsafe fixed anchors not receiving timely replacement. Although I know it will not apply to forest land in my local climbing area at this time, if a policy in this proposal were enacted in the National Forest area in the Red, the process for fixed anchor replacement would become much more arduous, and therefore much more dangerous and unsustainable.

I still think local climbing management plans are an important mechanism to be implemented in every area, no matter its qualification (i.e. National Forest land, NPS land, wilderness, non wilderness, private). However, I think fixed anchors should not be defined as prohibited installations, as this policy change would pose an additional unnecessary hurdle to the process of enabling effective management and positive stewardship of natural areas that will not only obstruct climbers (like myself) from enjoying wilderness areas but also place unnecessary burden on the systems responsible for managing the enforcement of this policy.

The elements of this policy, like restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands, will also create more hurdles to effective management as the inconsistency in climbing

management policy across land designations will create confusion and amongst climbers and land managers and therefore inevitable policy violations.

I urge NPS to consider reviewing positive examples of the decades-old, sustainable local climbing management practices on Forest Service land and even other types of areas (that do not consider fixed anchors as inherently prohibited, and do not restrict the establishment of new routes to "existing climbing opportunities") as a guide to hopefully reconsider elements of this policy. Thank you.