

Data Submitted (UTC 11): 1/28/2024 1:26:05 AM

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Comments: Hello,

I have been climbing outdoors for over 10 years. I have climbed in areas across the country and am very involved in stewarding the climbing areas in my own state of Massachusetts. As climbing becomes more popular I believe it is important to address the impact that climbers can have on the environment, but I am concerned about the proposed guidance regarding fixed anchors in National Forest Service.

Fixed anchors are essential for climbing. Climbers use fixed anchors for protection along the route, and at the top of the route so that they can safely return to the ground. The placement and number of specific fixed anchors needed on a climbing route is best determined by the climbing community, though thoughtful guidance on fixed anchors that is drafted with the help of climbers is welcome.

Requiring a Minimum Requirement Analysis for each fixed anchor, especially without providing significant resources in which to conduct the analyses, is unreasonable. By requiring a review of every existing anchor and every proposed anchor, the NPS is not only hindering new ways to explore the Wilderness through climbing, but also making climbing existing routes unsafe. Climbers should make decisions about when to replacing old and aging hardware, but adding a cumbersome and lengthy bureaucratic requirement would certainly dissuade most people from replacing the unsafe hardware. Many climbers would rather take the chance to trust their lives to a suspicious rusty bolt than take the chance that NPS would not approve the MRA request. The MRA disincentivises climbers from replacing hardware.

Fixed anchors are essential for protecting the natural environment. There are some climbing areas where the top of the cliff is accessible by a trail and the local ethic is to not use fixed anchors. In these places, the climber walks to the top of the cliff and uses trees to create an anchor out of slings and webbings which can be removed after they have finished climbing. While this may appear to have less impact than leaving two metal bolts permanently in the cliff, I have seen first hand how significant environmental impact is caused by the soil compaction from so much activity on top of the cliff. The trees die and the soil is lost, leaving a bare, open rock area at the top of the cliff. Areas where bolted fixed anchors are the norm have healthy, thriving ecosystems at the top of the cliff since there is no reason for climbers to stand at the top of the cliff or use trees for anchors.

Thank you for taking the time to read my comments,
Stephanie Giguere