

Data Submitted (UTC 11): 1/29/2024 7:37:57 PM

First name: Justin

Last name: Iskra

Organization: Central Wyoming Climbers' Alliance

Title: Executive Director

Comments: These management directives propose to reverse nearly 50 years of policy under the Wilderness Act, and will severely erode a century of cooperation between the climbing community and the US Forest Service in addition to creating safety concerns for existing climbing opportunities on USFS managed land. These policies would go against the USFS motto of caring for the land and serving the people. As I state below, the impacts of these policies will lead to resource damage while increasing safety concerns.

These policies not only an issue of public safety but will also lead to resource degradation as more climbers seek out natural features like trees for anchoring in absence of reliable anchors that are typically placed well away from vegetation features in clean sections of rock. The Central Wyoming Climbers' Alliance is not opposed to guidance on fixed anchor placement on USFS land, but these directives are unreasonable and will create more problems than they solve. Requiring MRA and approval for replacing aging gear and where we can develop will substantially diminish local climbing organization ability to effectively manage safety concerns. A collaboration between the USFS and the Access Fund would facilitate better management practices on USFS land while still allowing climbing and preserving climbing's rich history.

We advocate for legal placement of drilled anchors and protection bolts, placed sparingly and with respect for the rock and the environment. Replacement of existing fixed anchors should not be restricted in any way to ensure safety of the people recreating outside. We are against the requirements for permits for new routes. However, if a permit for a new route must be issued in certain rare and sensitive areas, it cannot require an exact fixed hardware count or even hardware types because this information is impossible to know in advance.

Aging hardware makes climbing routes and descents less safe, which causes more accidents. Maintenance of existing anchors is very important to the safety of climbers and is labor intensive to perform, the new directives will make existing routes more hazardous by restricting maintenance of bolts and anchors. Requiring an MRA to replace anchors at established areas will drastically increase safety concerns while increasing the amount of work for people within the USFS who may not be properly educated on modern climbing practices.

Rappelling is the primary cause of death in climbing accidents. When climbers rappel, they rely completely on an anchor, and anchor failure during rappelling often results in death. Prohibiting the maintenance of anchors or any placement of bolted anchors increases use of unreliable natural features that greatly increase the risk of anchor failure and impacts on vegetation.

Many summits, towers, and walls require rappel descent. Camouflaged, bolted anchors with stainless steel bolts are the safest, most durable, and lowest-impact rappel anchors. The alternatives to bolted anchors are leaving slings or cords on vegetation, which is both unsightly and can damage sensitive vegetation over time, or slinging existing features such as flakes, chockstones, or other natural constrictions. These alternatives are much more visible as slings and cord are larger and have a greater visual profile, much less durable as they are susceptible to UV damage, and greatly increase the risk of accidents occurring when damaged cord is used that cannot be properly inspected.

Climbing routes that follow continuous crack systems from start to finish and have walk-off descents that don't require rappelling are rare. Requiring permits for fixed hardware will essentially limit new routes to those that follow continuous crack systems to enable only the use of removable protection and don't require rappel descents. Again, there is no way to know if a bolt is required to protect a section of climbing until a route is climbed.

Climbers have a vested interest in preserving the primitive, unconfined, and solitary nature of the outdoors. We enjoy and explore these wild places and always try to minimize our impact. Our local and national stewardship organizations are continually educating climbers on how to reduce impact and protect wild places. Climbers have a small impact on the outdoors compared to recreational users and hikers, who are present in larger numbers and are generally less educated and more likely to leave trash, go off trail, or otherwise fail to practice Leave-No-Trace principles.

Placing undue and unreasonable restrictions on climbing will not protect these areas but will severely strain a largely beneficial and cooperative relationship between the climbing community and the land management agency. This will benefit neither climbers nor the USFS so I ask you as a climber and a steward of the outdoors to please reconsider your management policies and protect the rich and long history of climbing in the wilderness.

Thank you for reading these considerations and hope that climbers and the USFS can work together to create climbing management policies that benefit everyone while protecting both safety and the wilderness.

Sincerely,
Justin Iskra
Executive Director
Central Wyoming Climbers' Alliance