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Comments: Avid4 Adventure appreciates the opportunity to provide comments on the proposed guidance for managing climbing and safeguarding natural and cultural resources in wilderness areas. In summary, we strongly urge the NPS and USFS to withdraw the draft guidance due to its material negative impacts on youth participation in rock climbing through summer camps.

About Avid4 Adventure:

Avid4 Adventure was founded over 20 years ago with the mission of "engaging kids in active outdoor lifestyles" through summer day camps, resident camps, expedition programs and school programs. We have over 16,000 campers each summer in seven states with 500+ staff. We were the first camp to be Accredited by Leave No Trace and have also carried the American Camp Association Accreditation since our first year of operation.

Overview:

Avid4 Adventure is an unwavering supporter of wilderness and wild lands, with a history of conservation and education efforts to mitigate the impacts of outdoor recreation. Leave No Trace has been a core curriculum component in our program which has been formally provided to hundreds of thousands of participants. However, we express concern over the potential new restriction on fixed anchors outlined in the draft guidance.

In our history as an organization, we have seen and participated extensively in rock climbing as a historic use in Wilderness and on wildlands. We have also judiciously utilized fixed anchors as a minimum tool that enables our varied participants to access many rock climbs enabling unique experiences of solitude in primitive and unconfined recreation. Thus, it is with surprise and concern that these anchors could now be considered prohibited installations subject to Minimum Requirements Analysis resulting in potentially long or endless delays in replacing or installing vitally important safety anchors for campers and staff. It is unreasonable to create new guidance policies prohibiting these anchors when they have been allowed, managed and authorized for decades.

We see fixed anchors as an essential piece of an overall safety system for climbers and staff. We acknowledge the importance of managing climbing activities in wilderness areas to protect the environment and cultural resources. Nevertheless, the proposed restriction disproportionately affects camps, which serve as a vital gateway for youth to experience the outdoors. Camps, by their nature, often involve participants and staff members with limited training, making fixed anchors a critical tool for ensuring safety in rock climbing programs.

This restriction discriminates against and limits access for those who rely on fixed anchors for rock climbing. In many situations, this will create an unintended division of access, potentially allowing those with technical skills and training, often obtained at great cost and time, potential access (for example who can set up complex non-fixed top rope anchors), while restricting the more diverse, yet less technically proficient summer camp participant and staff from safe enjoyment of the resource.

Specifically, many camps utilize non-Wilderness Forest Service land for group top-rope climbing. Traditionally, the "area" is not part of an established climbing area and is often created by a Climbing Supervisor who may place several fixed anchors to enable a small group to use the site throughout the summer season. That repetitive summer use is often facilitated by lesser experienced Climbing Instructors or other staff, who are only able to administer the activity due to the prior fixed anchor establishment. This proposed new interpretation would prohibit this type of area to be developed without lengthy legal review, which could require extensive time and funding, should it ever occur, given funding shortages and priorities for agencies.

Additionally, with the contemplated restrictions, individuals, as opposed to institutional users, could be the most

likely population to disregard the guidance and continue to place or replace fixed anchors. Traditionally, professional guides and other institutional users exercise great forethought in the use of fixed anchors, thus an additional unintended consequence could be lower quality or thoughtfulness of fixed anchor placement, thus further deteriorating the safety of the sport.

Looking forward, we urge the formation of a strong stakeholder inquiry that expressly involves the critically important camp industry. Given its formative position in enabling youth to experience the outdoors, and thus creating advocates for wilderness and the outdoors, the camp industry has valuable insights to contribute to the development of policies that balance the preservation of wilderness areas with the need to provide safe and enriching outdoor experiences for the next generation.

Request/Recommendation:

Avid4 Adventure strongly recommends:

The continued use of existing fixed anchors without further review, unless there are site-specific resource concerns;

Allowing the maintenance of existing fixed anchors without prior approval, unless there are site-specific resource concerns; and

The authorization and placement of new fixed anchors in wilderness with a simple and efficient permitting process that does not require an MRA, as is current practice under NPS Director's Order 41.

Additionally, we request additional participation from the camp industry in the development of any guidelines related to climbing activities in wilderness or wild areas. The unique needs and challenges faced by camps, particularly in terms of fixed anchor usage for rock climbing, necessitate a comprehensive understanding of the industry's perspective. We propose the inclusion of camp professionals, educators, and representatives from the camp industry in the stakeholder process to ensure a well-rounded and informed approach.

Conclusion:

We urge the USDA Forest Service and National Park Service to withdraw the current draft guidance. The proposed restrictions on fixed anchors pose a significant threat to the safety and accessibility of rock climbing programs at camps, ultimately undermining the positive impact these experiences have on youth engagement with the outdoors. We remain committed to working together towards the shared goal of preserving wilderness areas while ensuring that the next generation has meaningful and safe experiences in the great outdoors. Thank you for considering our recommendations and for your ongoing dedication to the protection and accessibility of our nation's wilderness areas.