

Data Submitted (UTC 11): 1/30/2024 5:56:25 PM

First name: Drew

Last name: Brodhead

Organization:

Title:

Comments: January 30th, 2024

Subject: Comments on Fixed Anchor Guidance

FSM 2355 Climbing Opportunities #ORMS-3524

Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas

Dear Agency Representative,

I am writing to you today in response to both the National Park Service's and Forest Service's draft guidance regarding the management of fixed anchors in designated Non-Wilderness and Wilderness. I will be providing you with a unique perspective

For the last few years I have worked with the Salt Lake Climbers Alliance SLCA whose mission is to "engage as an advocate to protect outdoor climbing access as a steward to maintain sustainable climbing resources in the Wasatch and surrounding regions". Within the SLCA, I work as its Anchor Maintenance Coordinator for the Anchor Maintenance Program where we "assess the current condition of established anchors, identify and monitor current and future maintenance needs, and replace antiquated and unreliable anchors as necessary and in partnership with landowners and agencies."

Here at the Anchors program, we employ four anchor maintenance techs, including myself, to perform anchor maintenance on the vertical trails in the Uinta-Wasatch-Cache and Manti-La Sal National Forests. Like any professional trail crew, we hold insurance, workers comp, host annual training and keep to the strictest standards established by the Access Fund, American Safe Climbing Association and American Alpine Club. Created in 2020 by the request from the local National Forest, this is the nation's FIRST professional anchor crew performing this type of work on public lands.

This program is a success story of land managers and local climbing organizations coming together to help solve the problem of Americans against fixed anchors problem. Since 2020, this program has replaced and maintained over 3,500 bolts, working on nearly 500 routes. This equates to over 6.5 miles of vertical trail stewardship. As a professional in this space, I have pulled out hundreds of aging bolts and have seen first hand the dangers that are not visible to the public. The need for anchor maintenance on both wilderness and non-wilderness zones is a public health crisis and is needed for sensible management, not the one outlined in your proposals. If each route AND fixed anchor were to go under the proposed MRA process, thousands of aging fixed anchor will go unattended due to the red tape. I have first hand experience working with the Forest Service and the MRA process. There is too much room for interpretation, speculation and biases when applying this document to Americans aging fixed anchors.

This is a great opportunity for anchor maintenance to be professionalized across the nation. If the land agencies view vertical trails the same as horizontal trails, we can create jobs, replace fixed anchors and hold a standard of quality this industry needs. Like the bolts I have pulled, I have seen the failed attempts of individuals trying to fix an old fixed anchor: abandoning the original bolt, drilling a new hole and causing unnecessary damage to the resource due to a lack of equipment and or skill.

Not all forests are created equal. Not all designated wilderness areas are positioned in far off reaches of the United States. Here on the Wasatch Front, we have three wilderness areas that butt up against the urban

interface of the Salt Lake Valley: Lone Peak, Twin Peaks and Mt. Olympus Wilderness areas. All of these wilderness zones border extremely busy state roads including Utah 190 (Big Cottonwood Canyon), Utah 210 (Little Cottonwood Canyon) and Utah 92 (American Fork). Most of the climbing on the Wasatch Front lies within these three natural corridors. All of these wilderness borders start at least 300 feet from these busy state roads. To be climbing within these boundaries of the Lone Peak Wilderness, 300 feet from the busy road of Utah 92, this is not the wilderness that congress envisioned back in 1964. There is less noise pollution in a city of 2 million than a weekend within the Lone Peak Wilderness in American Fork.

My point being is that not all wilderness areas should be viewed the same with your blanket proposal in policy. Individual forests should be given funding to develop their own management plans under the Organic Acts. Forest should develop a climbing management plan that reflects the resource needs of the first. I also request that after 60 years the NPS and FS do not determine that fixed anchors as illegal 4(c) installation under the Wilderness Act. This determination now does not reflect previous actions and policies by these agencies.

The NPS and FS are pretending to be experts on this matter. They do not have first hand knowledge of the fixed anchor problem across the United States. They don't understand what the process entails to maintain these anchors. They don't know what COULD happen if red tape prevents professionals from addressing the problem. A real problem will turn this activity loved by millions into a real public health crisis. Please be on the right side of history and create sensible policy.

In conclusion:

DO NOT determine that fixed anchors are illegal 4(c) installation under the Wilderness Act.

Allocate funding and allow individual forests and national parks to develop their own climbing management plans in partnership with local climbing organizations.

Federal agencies and local climbing organization should work together to create sensible policy.

Do not prohibit real time decision making while placing fixed anchors. This will effectively be regulating "outstanding opportunities for solitude or primitive and unconfined recreation."

Reject the MRA process for maintaining existing and placing new fixed anchors

Drew Brodhead

Anchor Maintenance and Advocacy Coordinator, Salt Lake Climbers Alliance