

Data Submitted (UTC 11): 1/30/2024 6:03:29 PM

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Comments: I am a climber and a lover of the outdoors. Climbing is a popular sport, and gaining in popularity. It is an important recreation activity and has a place in national forests. In reading over the draft evaluation and authorization procedures for fixed anchors and fixed equipment in wilderness areas, it is unclear to me what criteria park managers/forest supervisors will use to determine if fixed anchors can be installed in a certain area. The minimum requirements analysis section is vague and unclear on what information and what criteria will be used to determine the "level or type of fixed anchor use that best preserves the totality of the wilderness character."

My fear is that the draft NPS proposal will be used to prohibit the installation of all fixed anchors in national forests. This will lead to more climbers dying outdoors, especially because the sport is getting more popular and gym climbers are climbing outside more frequently. Fixed anchors/bolts are important for safety--they allow easy anchor building, they allow for easier rappels on the way down from a climb, and they make for easier rappel transitions when going down from one pitch to another. Without these safety measures in place, only experienced trad climbers would be able to access national forests. Trad climbing is a tough style of climbing which requires carrying a lot of gear (cams, hexes, tricams, quickdraws, etc) and extensive experience with gear placement and anchor building with gear. There are other styles of climbing that are less gear intensive (sport climbing, top roping). If USFS is prohibiting fixed anchors/bolts in national forests, then this means that USFS would be prohibiting access for sport and top rope climbers. This would be a huge blow to the climbing community and a loss to the public's ability to recreate on public lands.

The climbing community loves the outdoors and is willing to work with the NPS and USFS to prevent erosion, prevent damage to trees and other wildlife, and minimize our impact on wilderness areas. However, unclear, arbitrary, and capricious fixed anchor evaluation procedures threaten general climbing access in all NPS and USFS sites. NPS and USFS need to be clearer on what information/criteria will be used to evaluate the placement of fixed anchors, and NPS and USFS need to be clearer about what other alternatives to fixed anchors will be acceptable.

In the absence of fixed anchors being available, it is likely that climbers will install dyneema or nylon slings around rocks, boulders, and trees and leave them in place for other climbers. Slings are colorful and visually disruptive, but worse they tend to rot over time and a number of climbers have fallen to their deaths after relying on fixed slings slung around rocks/trees in the wilderness that have rotted. In general, I think NPS and USFS need to consider the safety ramifications of removing fixed anchors and prohibiting the installation of new fixed anchors, as more climbers will likely fall to their deaths in the absence of fixed anchors.