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Organization: Northern Arizona Climbers Coalition

Title: President

Comments: Dear USFS,

We, The Northern Arizona Climbers Coalition (NAZCC), write to you on behalf of the Northern Arizona Climbing Community to provide comments on the USDA Forest Service's draft FSM 2355 Climbing Opportunities #ORMS-3524, which proposes guidance for managing climbing, protecting natural and cultural resources in wilderness areas.

The mission of the NAZCC is to "preserve public access and promote stewardship of climbing resources throughout Northern Arizona." As an organization focused on this mission, we are gravely concerned about the obstacles to regular maintenance of fixed anchors. True to our mission of stewardship, we believe that climbing can and should be managed in a way which respects the wilderness environment while still providing safe access to climbers. Our group of volunteer board members have been collaborating with local agencies on sensitive species closures, trail stabilization, road closures, graffiti removal, trash clean ups as well as fixed protection replacement. We do this volunteer work because of our love of nature and the connection with it that rock climbing has provided. A prohibition of fixed anchors and/or the ability to maintain existing protection would have an incredibly negative effect on not only our local climbing community, but the global climbing community as well.

There are multiple reasons rendering the proposed guidance problematic and non-enforceable. First, classifying anchors as prohibited installations under the Wilderness Act goes against sixty years of policy and practice that have successfully met the dual goals of protection of wilderness and climber safety. Requiring the replacement or updating of anchors to comply with an MRA process will undoubtedly delay necessary replacements of aging or unsafe hardware, putting the climbing community at risk. Moreover, this policy will handicap climbers by putting red tape in the way of climbers making life-or-death, in-the-moment safety decisions in the backcountry. For example, in many regions - including Northern Arizona - anchors are essential to safe climbing. Upon standing atop a tower (an experience that many in our region consider a pinnacle wilderness experience), walking down is not possible, instead, you must rappel from a fixed anchor. If an anchor seems unsafe, the current practice is for a climber in the community to quickly identify that problem and for a person or organization (such as ours) to move forward with replacing the aged hardware with safe, new hardware for the benefit of all. We strongly believe that if climbers are unable to update or replace aging anchors in a timely manner due the MRA process, the overall risk of accidents will increase. This policy adds an unnecessary, lengthy process that will disrupt the current practice of climbers sustainably managing anchor safety.

Second, we are concerned the proposal disincentivizes participation in the MRA process, which could result in serious safety risks. If a climber approaches the agency about a potential fixed hardware replacement, the MRA process opens the door for the entire route to be removed. The practical result of this policy is that climbers may avoid bringing the route to the agency's attention. Compounding this issue, the lack of additional funding to implement this new guidance raises concerns that the Forest Service will be able to complete the MRA processes in a timely manner - again delaying the replacement and updating necessary safety hardware. The Coconino National Forest in our region is vast and the existing staff are at full capacity, having little bandwidth to quickly implement such a complex and labor intensive mandate without additional funding or resources.

Third, the climbing community in Northern Arizona consists of many, strong advocates for wilderness and for the protection of wild lands. Many of our members were introduced to wilderness and to the backcountry through rock climbing. In the larger tradition of America's climbing legacy, the lands and towers of Northern Arizona play a storied role. The proposed change has the potential to erase much of this legacy and deprive future generations of both the joy of climbing on high desert sandstone and the opportunity to grow into the next generation of

advocates for America's wild places. This policy also threatens the future of climbing exploration in wilderness and non-wilderness by subjecting the establishment of new routes to highly subjective and likely lengthy approval processes. For all of these reasons, we urge the Forest Service to consider alternatives to the proposed guidance.

In such alternatives or revisions, we urge the Forest Service to include the following: (1) fixed anchors should be allowed by default in wilderness and non-wilderness areas to facilitate safe ascent and descent of formations and cliffs; (2) placement of fixed anchors must not be constrained or delayed by lengthy administrative processes, particularly in cases of replacement of fixed anchors where climber safety is implicated; (3) any mandates that place an administrative burden on Forest Service personnel to analyze climbing routes or create climbing management plans must be both funded and contain enforceable deadlines for completion in order to ensure the effective implementation of any future regulations; and (4) any new directives should contain policies and processes that encourage the participation of the climbing community and local climbing organizations. We urge the Forest Service to revise its policies to align with the widely-supported House Bill entitled Protect America's Rock Climbing Act and its complementary Senate Bill America's Outdoor Recreation Act. Both of these proposals protect wilderness climbing and allow for the judicious placement and replacement of fixed anchors.

Thank you for your time and consideration.

Sincerely,

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