

Data Submitted (UTC 11): 1/30/2024 7:17:41 PM

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Comments: Thank you for the opportunity to comment on this draft guidance! While I appreciate the effort to address the increased popularity of recreational climbing on Forest Service lands, as a climber, I strongly suggest amending this proposed directive.

In Wilderness areas, the bottlenecking potential of the Minimum Requirements Analysis, or MRA, for new and replacement fixed anchors only serves to have a chilling effect on climbing activity and climbing stewardship in our country's greatest and most beautiful areas. The climbing community stands against this proposed process for many reasons, but one is that it's unsafe: Placing decisions about climbing anchors in the hands of non-climbing land managers, and on a lengthier approval timeline, will mean that climbers will still attempt routes on potentially outdated and dangerous anchors. While perhaps well-intentioned, the process is unrealistic, even for MRA-approved anchors which would require special-use permits.

In non-wilderness areas, climbing development (through the establishment of new routes) is an incredibly important part of making an area safe, accessible, and clearly marked with trails, crags, and off-limits vegetation areas. In many cases, such as my home crag of Rumney (Rocks), New Hampshire, the USFS and local climbing organization RCA are well aware of specific areas where new development should be limited or prohibited for ecological or cultural reasons, or where climbing should be prohibited seasonally due to wildlife activity. Therefore, the approval process for new anchors is unnecessary and only serves to create confusion between climbing area stewards and our wonderful land managers who already work extremely hard to maintain our climbing area and other outdoor spaces in New Hampshire, New England, and beyond.