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Comments: Concerning the proposed directives related to climbing management on National Forest System (NFS) lands, I have several suggestions as a climber - someone who uses fixed hardware in our national forests for the purposes of safety and protecting essential wildlife like trees. The current language will place a de-facto ban on placing or replacing fixed anchors until extensive analysis has been performed, but provides no additional resources for districts to do so. The result is a blanket ban on anchor placement and maintenance.

First, fixed anchors are essential pieces of safety for climbers, and should not be considered prohibited "installations" under the Wilderness Act. It's also important to note that the proposed directives will not decrease climbing activity, as it has been growing in the US for years, but simply make it less safe. More climbers wish to practice their hobby outside of their gyms and on NFS lands - this trend has not slowed down, so working with these hobbyists to ensure safety and NFS desired outcomes is key. Per data from organizations such as the American Alpine Club, accidents are more likely to occur on climbs without fixed anchors. An uptick in accidents will inevitably cause a bigger impact on national forest lands and the resources required to protect it. Technical advancements in climbing gear have allowed for not only more minimal impact on nature, but safer conditions compared to decades before. Updating and replacing fixed hardware on a rock surface is less invasive and less costly than complicated rescues, which will inevitably happen with restrictions to replacing old and unsafe gear. I would therefore urge for the implementation of better policies that encourage easy and safe replacements/fixtures of such anchors. Existing policies have allowed for judicious use of fixed anchors for more than half a century, and stewardship with organizations such as the American Safe Climbing Association have made these processes easier and safer in the areas where they operate. These organizations also have extremely knowledgeable and dedicated volunteers/staff who are willing to partner with federal stakeholders and land managers, which lessens the burden on NFS staff and contractors.

Secondly, many climbs that do not have fixed anchors (or that have unsafe anchors in need of dire replacement) will put climbers in a precarious position to use trees as anchor points. Excessive use of such natural anchors has been shown to damage trees, and impacts vegetation and other wildlife around the tree(s). Whereas small, fixed gear on a rock face that can last for years without replacement is clearly the better option. The climbers who install this hardware are generally well-versed in how to make as minimal an impact as possible, and can easily replace this gear if and when needed quickly. They also are placed in clean sections of rock, well away from vegetation features.

In short, the proposals put forth (while well-intentioned) will actually cause more negative impacts on Forest Service lands, rather than reducing them. Climbing management policy should maintain opportunities for new anchors and anchor replacement unless analyses determine climbing should be restricted to protect cultural and natural resources. Thank you for your consideration.