

Data Submitted (UTC 11): 1/31/2024 1:55:43 AM

First name: Grant

Last name: Bullard

Organization: Gwynn Valley Camp

Title: Director / Owner

Comments: I believe the proposed restriction disproportionately affects camps, which serve as a vital gateway for thousands of youth to experience the outdoors. Camps, by their nature, often involve participants and staff members with limited training, making fixed anchors a critical tool for ensuring safety in rock climbing programs. As a climber, camp owner/director for over 45 years, I consider this to be a very bad decision based on the safety records of ours and many camps throughout the nation. It is short sighted on the part of NFS and the USFS.

This restriction discriminates against and limits access for those who rely on fixed anchors for rock climbing. In many situations, this will create an unintended division of access, potentially allowing those with technical skills and training, often obtained at great cost and time, potential access, while restricting the more diverse, yet less technically proficient summer camp participants and staff from safe enjoyment of the resource. I agree that safety is our number one concern which we do our best to mitigate those concerns by requiring our staff to be certified by the AMGA in the Single Pitch Instructor Course.

I am requesting the withdrawal of the draft guidance and establishment of a study group that includes representation from the industry, particularly the camp industry, to determine the potential impact of these restrictions.

The American Camp Association strongly recommends and I support the following recommendations.

The continued use of existing fixed anchors without further review, unless there are site-specific resource concerns;

Allowing the maintenance of existing fixed anchors without prior approval, unless there are site-specific resource concerns; and

The authorization and placement of new fixed anchors in the wilderness with a simple and efficient permitting process that does not require an MRA, as is current practice under NPS Director's Order 41.

Creation of a Study Group with participation from the camp industry in the development of any guidelines related to climbing activities in the wilderness or wild areas.

Thank you for your time.

Grant Bullard - Director/Owner

Gwynn Valley Camp