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Comments: To Whom it May Concern,

I am writing to comment on the proposed directives, XXX, regarding climbing and fixed anchors/equipment.

I'd like to thank the Forest Service for acknowledging climbing as an important recreational opportunity in many wilderness areas around our country. Climbing is, was, and will continue to be a huge part of many people's lives and livelihoods. Its recognition as such and efforts to preserve access to safe climbing are deeply appreciated by all of us who engage with climbing to any degree.

As climbing continues to grow in popularity, it strikes me as necessary to take steps to ensure that climbing is a sustainable pursuit and that increases in the number of climbers do not negatively impact wilderness areas that support climbing. I think that it's important to develop policies and directives that bear in mind the necessity to preserve wilderness areas and the need to make climbing safe, through the appropriate maintenance and installation of fixed anchors and equipment.

I agree that having a climbing management plan for areas where climbing takes place is generally a good idea. However, I think there are a few fundamental shortcomings with the currently proposed directives.

The proposal that all current and future fixed anchors/equipment go through an MRA process creates an unnecessarily burdensome process for members of the Forest Service, and the time needed to complete MRAs on such a vast scale does not seem realistic or feasible without a significant increase in Forest Service personnel and budget. It does not appear that there is an accompanying apportioned budget increase to support this work. Requiring the MRA process for every single piece of fixed anchor hardware that is installed is unrealistic and would compromise the important work of installing new hardware or fixing old hardware to provide safe access to climbing routes. The MRA process would be too restrictive and prevent timely action that could prevent serious accidents and injury.

A review process and monitoring/reporting system for fixed anchor/equipment maintenance and installation would be a great asset to climbers and to the preservation of climbing areas. This system would benefit from having more flexibility and adaptability than the MRA process, to allow for possible unforeseen situations which may require expedient attention to fixed anchors/equipment.

In addition to reassessing the appropriateness of requiring the MRA process for fixed anchors/equipment, it seems that this directive places undue responsibility on Forest Service Supervisors. To appropriately administer an extensive climbing management plan and monitoring/assessment for fixed anchors/equipment, districts should make provisions for specialized staff to oversee and carry out responsibilities associated with implementing a climbing management plan. Working closely with local and nationally reaching climbing organizations, such as chapters of the Access Fund and the American Safe Climbing Association, may also help lift the burden placed on Forest Service districts. Implementing a climbing management plan will take time and resources and must be supported appropriately.

A phased roll-out of climbing management plans will also be essential for ensuring compliance and acceptance of new regulations. Any procedural changes should be well-advertised with appropriate grace periods for compliance so that individuals have the opportunity to educate themselves and access resources to adhere to anything like permitting or review processes. An immediate enactment of new policies and procedures may result in unnecessary and unintentional conflict between Forest Service personnel that may affect the ability to carry out

climbing management plans.

In summary, I very much appreciate that the Forest Service is taking steps to help manage climbing and create safe climbing opportunities on their land. I urge representatives to reconsider the MRA requirement and ensure that any new directives are appropriately supported with budget and personnel. I am encouraged by the openness to comments on these directives and hope that input from climbers and guides like me will be taken seriously. Access to recreational opportunities and wilderness areas can have a profound impact on mental/emotional and physical health for individuals, as well as support our country's economy. I can say that I personally would not be where I am today - healthy, happy, and employed - without climbing and the ability to explore and enjoy our country's greatest national resource - public land.

Thank you for your time and consideration. I look forward to seeing updates to these proposals and supporting the future of climbing in our country.