

Data Submitted (UTC 11): 1/31/2024 3:56:06 AM

First name: Nicholas

Last name: Henscheid

Organization:

Title:

Comments: I am writing to provide comments on the proposed USFS policy changes with regard to fixed anchors in the Wilderness. My comments represent my position both as an individual climber and as a member of the board of directors of a nonprofit Local Climbing Organization (LCO) called CASA (Climbers Association of Southern Arizona). As with all LCOs, CASA exists to build community, educate climbers, engage in stewardship, and maintain fixed anchors throughout climbing resources in Southern Arizona.

First, I would like to highlight how important climbing on public land, both Wilderness and otherwise, has been to my mental and physical well-being over the past 13 years. Rock climbing has been my main form of physical exercise and the primary source of my friendships and sense of community since 2011. I have centered my life around this activity and it has been one of the most unbridled sources of joy, motivation, challenge and passion in my life. I would not be able to do what I do in the rest of my life - be a good partner, father, employee and community member without this connection to climbing and the outdoors. It is well-understood that community, physical activity and a connection to nature are key components of a happy lifestyle, and I believe strongly that this is true in my life and in the lives of many others.

Secondly, I would like to emphasize that many climbers, myself included, understand the need for, and the value in, reasonable climbing management strategies from federal and local agencies. For decades, new climbing routes and areas have been developed in a completely ad hoc manner by passionate and dedicated individuals who put their time and resources into exploring and making climbing recreation opportunities available on public lands. Millions of person hours and dollars have been spent to this end, nearly all of which on a volunteer basis. With this unregulated, unmanaged approach, however, there have been instances where individuals have not followed best practices, though in many cases it is not clear what the best practices are or should be. This has in some instances led to conflict within the climbing community, where disagreements arise over how and where certain routes and equipment should be allowed. In order to maintain and expand the legacy of climbing in America, it will be essential to partner with land managers to create a reasonable management framework that aligns with the needs of the community as well as the spirit of existing law such as the Wilderness Act. Many climbers - myself included - want better management because it would allow for continued access and development while eliminating many sources of conflict. There are numerous instances both within the US and internationally where effective management policies exist.

Next, I would like to discuss how the proposed changes have the potential to cause a drastic impact on the ability of climbers like myself to safely access and enjoy the public recreational resources that we hold so dear. In short, the proposed changes would effectively ban safe climbing in Wilderness (and potentially non-Wilderness) areas, and this is an untenable outcome that is not in line with existing policy, with congressional intent, or reasonably in line with the will of the public. In detail,

1. Fixed anchors are an essential part of the safety system of climbers, regardless of the style and location of climb. Without fixed anchors of one form or another, the safe ascent and descent of rock is, in most instances, impossible. Fixed anchors also facilitate safe and effective search and rescue efforts, and can indeed reduce the need for such operations because they allow climbers to rapidly retreat in the face of changing conditions. In many instances, it is necessary to leave fixed protection in order to facilitate a life-saving retreat, and in many other instances removable protection becomes fixed despite the best efforts to remove it.

2. While it is true that fixed anchors constitute an unnatural remnant of climbing activity, well-camouflaged anchors can be made invisible to anyone who isn't intending to make use of them. Thus, when placed correctly, a climbing anchor is not an installation as far as anyone but climbers is concerned. Whereas a road or structure

may be seen by anyone wishing to enjoy the Wilderness, an appropriately camouflaged climbing anchor some distance up a cliff is quite literally invisible unless one is intending to use it. Properly placed fixed anchors will last decades and have no discernable impact on the ecosystem, and thus do nothing to impact the spirit of the wilderness.

3. The designation of fixed anchors as installations, thus requiring an MRA, creates an unenforceable bureaucratic nightmare for both climbers and land managers. Needing to follow the same painstaking approval process to have a new or existing route approved as would be required to build a road or structure is so unrealistically out of line with existing management strategies that I fear it would not be followed at all, leading to a deepening rift between climbers and land managers that would undo decades of improvements to our relationship.

As an additional point, the first issue highlighted above creates an unintended equity concern that is worth mentioning. While all climbing is inherently dangerous, the presence of high-quality fixed anchors mitigates this danger to a great degree, and the more fixed anchors are present on a given route, the greater number of individuals will be willing to climb that route. The result is that restricting or removing most or all of the fixed anchors will create a situation where only the least risk-averse climbers will be willing to participate. Risk aversion is a reasonable mindset for nearly everyone, especially those with families, and only a particular combination of privileges can lead to someone to be willing to risk their life on a regular basis to participate in a recreational activity. Climbing is struggling to expand its appeal to underprivileged communities and this has been a key sticking point. The point is, the proposed policies would add to an existing gatekeeping culture that many in the climbing community have worked very hard to dismantle, and this would disproportionately effect underprivileged communities who do not feel they can afford to be risky.

Lastly, I would like to highlight several ways in which the activities of LCOs like CASA would be greatly hindered by the proposed policy changes. Nationwide, LCOs work very hard to maintain climbing resources, putting thousands of volunteer hours in every year to maintain access routes, control erosion, and update outdated fixed anchors so that climbing is safer and more sustainable. We work with local land managers to follow best practices and do work that aligns with their management plans. In particular, CASA has a very good relationship with the Coronado National Forest (CNF) and more recently with Saguaro National Park. We have worked to maintain these relationships by providing exceptional stewardship of our climbing resources, and have plans to continue expanding this relationship in the future to assist with the CNF's management plans. The proposed policies would create an awkward situation whereby the local rangers would feel at odds with the goals of the LCOs, and this would hinder the possibility of future productive collaborations. As I mentioned previously, this is an outcome that no one wants because it leads to a lack of buy-in from climbers and an adversarial relationship between land managers and users.

I will conclude by suggesting that a better outcome is possible for both land managers and users, but that this will depend on land managers and users coming together to discuss reasonable management. The proposed policies have created a sense of panic and vitriol within the climbing community, with many viewing the federal land managers as an adversary. The relationship doesn't have to be this way - we can work together to create something better. I strongly recommend working with organizations such as the Access Fund and American Alpine Club to reach a set of policies that is sustainable and beneficial to all who wish to enjoy and preserve Wilderness areas in the US.

Sincerely,
Nick Henscheid