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Title: Public Lands Director

Comments: Please accept the attached pdf comments on behalf of Wild Montana.

Peter Mali

National Wilderness Program Manager, United States Forest Service

1400 Independence Avenue SW

Washington, DC 20250- 1124

Re: FSM 2355 Climbing Opportunities #ORMS-3524

Submitted electronically via

<https://cara.fs2c.usda.gov/Public/CommentInput?project=ORMS-3524>

January 18, 2024

Dear Director Mali,

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association) and our members in response to the public comment period for FSM 2355 Climbing Opportunities #ORMS-3524.

I. Organizational Background

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana and our more than 3,500 members are invested in the ecological integrity and quiet recreation opportunities on public lands across Montana, as well as the impact of climate change on Montana's wild places.

Wild Montana appreciates the Forest Service's consideration of these new directives, and we support the proposed additions to the Forest Service Manual as written. Climbing is a popular outdoor activity that is gaining increasing popularity. It is critical for the Forest Service to proactively develop policies to direct this sport on public lands, particularly in designated Wilderness areas and areas that hold unique Wilderness character.

II. Considering Impacts to Wilderness Character

We recognize that climbing is an important recreational activity on public lands, including in Wilderness. We also recognize the need to protect wilderness character where it still exists. The particulars of climbing-like the establishment of staging areas, new trails to access walls, designation of routes, and the establishment of fixed anchors on walls-including the authorization of the activity in general, must be determined with place-based Climbing Management Plans (CMPs) for each National Forest seeking to authorize climbing activities in Wilderness or other areas where there may be adverse

resource impacts or use conflicts. These plans and their development must be in accordance with the Forest Plan and follow all applicable laws, including but not limited to, the National Environmental Policy Act and Endangered Species Act. While climbing is generally a suitable activity in Wilderness, CMPs must determine on a case-by-case basis if climbing is compatible with the particular resources present in a given Wilderness area and if so, to what extent. Where climbing in general or more advanced climbing infrastructure would significantly impair Wilderness characteristics or create resource conflicts that significantly impair Wilderness characteristics, those activities should not be authorized.

On the Bitterroot National Forest in Montana, we have supported the creation of a collaborative process to develop a CMP. Through this process, we also learned the importance of the Forest Service inventorying and managing the infrastructure and developments associated with climbing. In the final directives, we recommend the Forest Service include a provision regarding inventorying and monitoring fixed climbing infrastructure so that Forest Service staff have an appropriate baseline understanding for the creation of a CMP or other climbing regulations.

We appreciate the proposed provision directing the Forest Service to undertake a Minimum Requirements Analysis for existing fixed anchors and equipment in Wilderness Areas. Furthermore, we support the proposed provision that the Forest Service can authorize the placement or replacement of fixed anchors or equipment in Wilderness based on a case-specific determination that "they are the minimum necessary for administration of the area for Wilderness Act purposes, including primitive or unconfined recreation and preservation of wilderness character." Climbing itself is a form of quiet, non motorized, non mechanized recreation. Certain activities associated with climbing, like securing fixed anchors with drills or glue, however, may not be conducive to maintaining wilderness character. These more intensive infrastructure developments can irreparably damage rock faces and interfere with critical wildlife habitat or breeding sites, along with other impacts that may be site-specific depending on the area's geological, geographical, and biological characteristics. It is important that the Forest Service thoroughly consider and analyze the authorization of climbing and any associated infrastructure development.

III. Conclusion

Thank you for the opportunity to comment on this proposal. We look forward to seeing the final directives. Please do not hesitate to contact us if you have any questions.