

Data Submitted (UTC 11): 11/17/2023 7:14:00 PM

First name: Jared

Last name: Prolo

Organization:

Title:

Comments: To whom it may concern,

I enjoy climbing, backpacking, skiing, biking, and camping in USFS lands and designated wilderness areas. I strongly oppose some of the elements of the proposed additions to the FSM. Climbing has a rich history in both USFS lands and wilderness areas that significantly predates the creation of the wilderness act. The placement, maintenance, and even removals of inappropriate or excessive fixed gear has been well taken care of by the climbing community. Indeed, among all recreational activities climbers often have the greatest amount of communication and discussion about what is, and is not, appropriate in different areas for the sport. It is unclear to me how the USFS can add to this process. The proposed regulations add significant work for the USFS in the planning, review, inspection, and supervision of all fixed anchors. Considering the significant budget shortfall for core functions, the result of this unfunded mandate will effectively be a ban on safe climbing, as there will be no actual resources to do the work prescribed in the proposed changes.

I would strongly suggest using the climbing management at Pinnacles National Park as a model. There is substantial climbing over a long period of history, spanning from private lands, to National Monument, to National Park, and includes climbs in the Hain Wilderness. The collaboration between non-profit climbing groups, the Park staff, and the climbing community have helped minimize the impact of climbers on the natural features, and on the endangered wildlife all the while keeping climbs, including historic climbs, equipped safely and only thoughtfully adding new gear and only when strictly necessary.

A significant worry I have is climbing in wilderness being managed like activities are currently being managed in the Black Canyon of the Gunnison (of which about half is designated wilderness.) Here the park superintendent has been reducing services, including SAR, citing extreme resource and budget restrictions. As such, there has been a material increase in the danger of recreating in BCGNP and rescues have become more difficult. If current park and wilderness staff are unable to maintain basic services additional responsibilities will be ignored.

There should be no requirement for specific supervision, review, or inspection by USFS for fixed climbing gear as part of the FSM. There should be guidelines for best practices and the recommendation for collaboration with user groups to ensure responsible practices. There should be greater emphasis placed on the ban on powered equipment, and then actual enforcement for violations.