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Organization:

Title:

Comments: Dear Sirs,

I would like comment on the proposed directive FSM 2355 Climbing Opportunities #ORMS-3524. As an avid climber throughout the western United States for the past 45 years, I have greatly enjoyed and appreciated the freedom to climb the peaks and cliffs on our federal lands without undue hindrance or overly burdensome regulations. Climbing is a low impact recreational activity, but I understand the need, especially as the "sport" grows in popularity, for our federal land management agencies to have consistent directives and management oversight. That said, I am concerned in particular that the wording of the this directive could spell the end of much climbing in designated wilderness areas in particular. Climbing does entail, at times, the leaving behind of temporary anchors such as webbing and slings. Further, to keep the sport safe and actually cleaner, fixed anchors are often less intrusive and intrusive to the wilderness environment. Fixed anchors do not rot and leave behind colorful, poly webbing remains. They blend into the environment and are only seen by climbers using them. They provide a much safer ascent and descent for climbers.

I am happy to see that that the proposed directive states that it "...would provide that climbing is an appropriate use of NFS lands (proposed FSM 2355.03, para. 1)-including in wilderness-when conducted in accordance with applicable law and Forest Service directives and consistent with the applicable land management plan."

I am concerned, however, about the wording that says "1); that a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed 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 (proposed FSM 2355.32, para. 1); that existing fixed anchors and fixed equipment in wilderness may be retained pending completion of a Minimum Requirements Analysis, as funding and resources allow, that determines they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character (FSM 2355.32, para. 5)."

Given the general lack of funding and man-power shortage of land management agencies, I do not see how land managers will be able to make such determinations on a case specific basis. I am concerned this wording could lead to the carte blanche orders by Forest Supervisors to remove even currently existing anchors from wilderness areas, even from El Capitan in Yosemite! I am also concerned that the lack of manpower and time will prevent forest supervisors from permitting anchor installation or bolting of new routes.

Please reconsider this proposal and work with climbing representatives such The Access Fund and other organizations. Thank you for your consideration.

Randy Hohf

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