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Comments: I generally agree with plans to regulate climbing activities subject to a climbing management plan. I believe there are some ways the proposed changes for FSM 2350 can be improved.

First, I believe that replacement of existing fixed anchors should not be subject to agency funding. Fixed anchor replacement is generally necessary when the anchor is no longer safe and must be replaced to protect the climber. This, I'd suggest a timeliness standard such that replacements are approved if no response is received within a reasonable time from the Forest Service.

Second, I'm confused by the restriction on drills and epoxy for placement of a fixed anchor. Modern bolts are typically epoxied, and this protects the rock and the anchor and should reduce frequency with which replacements are necessary. Older expansion bolts allow water penetration behind the bolt, which results in failure particularly after freeze-thaw cycle. I believe this provision is unnecessary and should be removed or altered to allow the type and method for placement on a case by case basis.

Last, I believe FS personnel should have specific guidance about potential misinterpretation of "Leave No Trace" (LNT) principles with respect to fixed anchors. Modern anchors are typically camouflaged and rust resistant, representing significant improvements to safety, which preserve valuable resource expenditures for preventable injuries and rescues. I believe fixed anchors do not violate LNT any more than other necessary placements for sanitation, shelter or interpretation. I believe the language in the manual should be revisited to further clarify vague language that may be misinterpreted.