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Comments: Thank you for the opportunity to submit comments on this well-considered proposed directive. The directive appears to touch on the important topics, but there may be several areas where clarification or additional emphasis could be helpful in providing implementation guidance to personnel and partners on local units.

ESTABLISHED TRAIL MANAGEMENT PRACTICES PROVIDE ABUNDANT PRECEDENT FOR CLIMBING OPPORTUNITY MANAGEMENT

Climbing routes are fundamentally like any other trail type (hike, bike, horse, OHV, etc), so that there is significant benefit to building on the well-established precedents for trail planning and management:

* Climbing routes where no fixed anchor placement or other development activities have occurred are the same as any other unauthorized trail. Unauthorized trails evolve organically, as increasing numbers of visitors travel along the same line. Absent a closure order or other restriction, unauthorized trail users generally only come into conflict with management when we use tools to actively develop and maintain our unauthorized trail. It has, in fact, only been climbers who have been allowed to use tools and permanent structures to develop our unauthorized trails.

* Climbing routes share with all other trail types the same familiar list of resource concerns. Archaeology, botany, watershed, wildlife, and more ... these well-known areas of analysis apply equally well to climbing routes as to other trail types, as do the planning processes (e.g., trails NEPA, wilderness MRA) established to explore these potential avenues for resource damage.

* Climbing routes - if officially recognized through this proposed directive - will require ongoing management just like all other trail types. Trails are trails, although each trail type has some unique aspects to its management. For climbing routes, management may be colored by the skill set needed for access and maintenance. But this is nothing new, because other trail types (e.g., OHV, high alpine, deep backcountry, rugged wilderness) may also have their particular access/maintenance skill sets.. These skill sets may be found among cooperating partners or agency personnel. Regardless of where that capacity lies, ongoing management will generally be addressing the same classic resource concerns that shape all other trail planning and management efforts.

* Climbing routes are also the same as other trail types in another critical aspect: connectivity. System trails are not developed in isolation, without connection to roads or another system trail. Similarly, climbing routes must be accompanied by approach and exit trails. This need becomes critical as use increases, so that any management action likely to lead to increased use must be accompanied by actions to provide system connectivity. Without system connectivity, the resource concerns of climbing routes may be less than those of the unauthorized access trails that are sure to occur if system connectivity is not provided. Within the scope of the proposed directive, there are two management actions with clear consequences for increased visitation: official recognition of a climbing opportunity and authorization of fixed anchors/equipment installation. A climbing directive cannot be complete without stipulating system connectivity when 1) officially recognizing a climbing opportunity, or 2) authorizing use of fixed anchors/equipment.

* Climbing routes are like all other trail types in that all have a tradition of using tools and permanent structures to develop unauthorized trails. The argument is often made that fixed anchors/equipment are a timeless tradition and essential part of climbing. But this same argument could be made for any type of trail. Climbing is unusual

only in that while the trailblazing traditions of other user groups have been rendered illegal, climbers have been allowed to continue using tools and permanent structures to develop unauthorized trails.

* Climbing routes are like all other trail types in that all may claim that use of tools and permanent structures may at times improve the safety of unauthorized trails. But with all other trail types that argument doesn't change the fact that a trail is unauthorized and its unauthorized development is illegal. Only climbing has been granted exemption, permitted to use tools and permanent structures to develop unauthorized trails in the name of safety.

Climbing routes have a minor novelty in that a climbing site may have many routes traversing a shared cliff face. This is roughly equivalent to the "braiding" of other trail types. With other trail types, braiding is undesirable. But with proper planning, the "braiding" of climbing routes may be highly appropriate across the durable rock surface, provided that all other access and resource concerns have been adequately accounted for across the width of the cliff face.

Climbing routes are "vertical trails". Climbing routes with fixed anchors/equipment are - whether official or unauthorized - constructed trails with permanent structures. Those climbing routes established without the benefit of official planning (NEPA, MRA, etc) are unauthorized trails. Those climbing routes officially recognized with the advent of climbing management plans will be strongly analogous to NFS system trails, and should follow system trail planning precedent - including trails NEPA, wilderness MRA, etc. Ongoing management of climbing routes are sure to require monitoring and maintenance just as their horizontal counterparts.

SHARED UNDERSTANDING OF THE TERM "DEVELOP" WILL SUPPORT SUCCESSFUL IMPLEMENTATION OF THIS DIRECTIVE

Lack of formal recognition for climbing as an appropriate use of National Forest has tacitly granted climbers unique exemption from the restrictions applied to all other types of recreation. Hike, bike, horse, OHV, and more -- all these forest use types share clear requirements for the development of their trails. Trail development that does not meet those requirements creates unauthorized trails -- a widely known source of resource damage and other management concerns. Climbing, however, has not been held accountable to the established processes of due diligence. It is a credit to the climbing community that in many cases climbing partners have stepped forward as leaders in the effort to mitigate the resource impacts of climbing use. Partners have also provided essential capacity for access to cliffside sites for purposes of resource protection. However, no guidance has been given for responsible climbing route development on National Forest. This has led to a widely established practice of unauthorized trail development. Even the word itself, "develop", is commonly used by climbers in connection with unauthorized trails - as in "developing a new site" or "developing a new route".

Successful implementation of this directive may depend on clarity around use of the word "develop". That word and its derivatives appear two dozen times in the proposed directive, demonstrating its importance in the communication of management guidance. But the word "develop" also has strong associations for climbing partners/users. For the sake of partnerships and public education, it may prove critical to achieve the best possible clarity around a shared use of the word "develop".

There is also a parallel need to clarify a trigger for the engagement of management action. Where in the continuum from zero use to heavy use of a climbing opportunity does management intervention become a priority? Can a shared understanding of that trigger be achieved, so that users, partners, and management alike may recognize resource concerns?

Broadly speaking, helpful ingredients for shared understanding may already exist:

* Both management and visitors understand that a "developed" site has been made more accessible.

* Both management and visitors understand that a "developed" site has been altered for a purpose.

How are climbing opportunities made more accessible, and how are they altered for the purpose of climbing?
These things happen by degrees:

* Use alone may have the indirect effect of improving access and altering a site. For example, vegetation and lichen may incidentally be broken or worn away.

* Then light tool use may intentionally make temporary changes. For example, vegetation may be cut, or lichen and sparse soil cleared away with brushes.

* Finally, heavy tool use may make permanent changes. For example, installation of fixed anchors/equipment.

When use of a climbing site is the only factor improving the site's accessibility and altering it for purposes of climbing, then potentially neither management nor partners/users may consider the site "developed". From the management perspective, off-system travel is common practice on undeveloped National Forest. From the partner/user perspective, some weight may be given to "first ascents" and the discovery of new climbing routes, but even if a route is "discovered" it may not necessarily be discussed as being "developed". So the mere presence of climbing use may not constitute a widely understood trigger for management action.

When light tool use occurs, interpretations may be mixed. From the management perspective, there is certainly the potential for concern. For example, there may be threatened plant or lichen species at a site, or a rare and easily-impacted habitat, or a cultural resource vulnerable to such activity. From the partner/user perspective, plant/lichen/soil changes may seem minor, and as a practical matter many management personnel might be inclined to agree if no critical resource values appear to be at risk. So light tool use is not necessarily a clear trigger for management action. If site-specific resource values are at risk, it must be the responsibility of management to educate partners/users about the unusual circumstances.

When heavy tool use occurs - with rock drilled and fixed anchors/equipment installed - then a broader acknowledgement exists that a climbing opportunity is "being developed". All recognize that these changes are permanent, that they make a site more accessible, that the site is now being altered for purposes of climbing, and that these development activities may lead to increased use of the site. So the installation of fixed anchors/equipment recommends itself as a clear trigger for management involvement.

So for purposes of shared understanding around when a climbing route is "being developed", two potential triggers may be adapted from well-established precedent around other types of unauthorized trails:

* For those climbing routes where critical resource values are already known to management, any climbing use at all could be a concern, and light tool use could constitute unacceptable "development"..

* For all climbing routes, regardless of foreknowledge of resource values, heavy tool use and the installation of fixed anchors/equipment represent "development".

To test those two potential triggers, consider the case of an increasingly popular "trad" (traditional) climbing site where fixed anchors are not used. This is a common scenario - sometimes because of the nature of the site, sometimes because of the values held by area climbers. At such a site, it could be possible for heavy climbing use alone to lead to noteworthy negative impacts to critical resource values. If those critical resource values were not already known to management, then increased visitation could be the primary indication that the site has become a priority for management attention. So the two triggers above will have failed.

A more broadly applicable approach concentrates on key factors, retaining flexibility:

- 1) Management approval - supported by the proper planning and well established precedents of trails management - must be required for installation of fixed anchors/equipment.
- 2) Management approval may be additionally required for light tool use if critical resource values are known to be at risk.
- 3) Additional management action may be needed even if no tool use is occurring. For example, high visitation to a climbing opportunity may result in significant resource damage even if no tools are being used to improve access or alter the site for purposes of climbing.

For management to fulfill its responsibility to the resource, installation of fixed anchors/equipment must require management planning and approval. If management has additional concerns about a site, then they must educate partners/users about those concerns and the means to mitigate them.

WILDERNESS CONSIDERATIONS

Wilderness areas intentionally provide for climbers the same experience as for other user groups. Many climbers highly value the opportunity to climb where there are no fixed anchors/equipment, and wilderness areas are uniquely positioned to provide that visitor experience.

Generally, the proposed directive has done well to highlight the consequences of fixed anchors/equipment in wilderness areas. Areas for improvement include:

* It is essential to clarify that climbing route development is equivalent to trail development for the many reasons already discussed above. Once that point is clear, then there is less vulnerability to misunderstanding around fixed anchors/equipment, because trail development and associated permanent structures in wilderness already benefit from a widely-understood planning process, including NEPA. Nevertheless, the proposed directive has done well to stipulate a Minimum Requirements Analysis for fixed anchors/equipment in wilderness, as MRA's may not be commonly performed in wilderness trail planning.

* Although the proposed directive thoroughly discusses MRA use with regard to fixed anchors/equipment, it lacks language specifying that MRA use is in addition to NEPA and other processes. It must be made clear that wilderness requirements are in addition to non-wilderness requirements, not instead of.

CONCLUSION

While the absence of recognition for climbing on National Forest has, in effect, granted climbers a privileged near-term recreation experience, it has denied us the more profound long-term experience of participation in national public lands. National Forest is among the greatest of American institutions, yet climbers have been excluded from the planning processes that build the National Forest community and lead to conservation success. With the advent of this climbing directive, and the climbing management plans it will foster, climbers will be supported in better understanding the resource and cooperating in its sustainable management.

While appreciating the proposed directive and the efforts that have clearly gone into its creation, Wild South would like to emphasize the following concerns:

* While the various ingredients of proper planning are scattered throughout the document, it may be helpful to

state clearly and succinctly that development of climbing opportunities requires the standard planning process to which all other recreation developments are subject, and that to develop a site (including installation of fixed anchors/equipment) without that planning process is prohibited, effective immediately with the issuance of this climbing directive.

* While the proposed directive mentions the need for system access to climbing opportunities, it may be helpful to explicitly require system access before management inadvertently increases visitation through official recognition of a climbing opportunity, or the approval of fixed anchor/equipment use at the site.

* Language must be added to the directive to clarify that wilderness planning requirements are in addition to - not instead of - non-wilderness requirements.

This climbing directive is being issued at a time when the agency is aggressively attempting to reduce planning burden for Forest projects. Yet the directive is introducing a new sector of trail projects that will only add to the planning docket. Recognizing that the Forest Service is taking the high road to acknowledge climbing as an appropriate Forest use, it is critical that this directive uphold the planning precedents to which all other Forest recreation uses are subject for good reason.