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Comments: The East Idaho Climbers Coalition (EICC) is a registered 501(c)(3) volunteer organization, dedicated to climber education, land stewardship, and preserving climbing access in Eastern Idaho. Some of our climbing locations are on USFS lands, wilderness and non-wilderness. Without modifications the proposed FSM 2355 Climbing Opportunities #ORMS-3524 draft Directive will negatively impact the recreational opportunities for anyone who requires fixed anchors for safety, and exploration in and out of the wilderness.

Individual climbers have for decades maintained and replaced worn anchors in the wilderness. These anchors can be the only method of descending safely. They are often a better choice than long slings and cords wrapped around questionable objects; these soft goods are often colorful, unsightly, wear quickly, and attract animals. In comparison, two small anchor bolts are often unseen and do not attract wildlife. They have a much longer lifespan and provide safe means of descending for a much longer time

They will, if the proposal is enacted, be considered "installations". Climbers as good stewards will no longer be able to replace them when needed - this will increase accidents and fatalities in the wilderness.

We propose that the draft directives be modified to indicate that climbers can continue to maintain and replace worn fixed anchors as they come upon them, and that these not be classified as "installations".

Numerous Minimum Requirements Analysis will be needed to decide what areas and anchors can remain open or not. These will strain the already tight Agency budget. The EICC is concerned that the Agencies first step will be to close ALL areas, AND then do MRAs when funds become available. This will remove a large amount of recreational opportunities in and out of wilderness. Some of these areas have national significance in the history of climbing and mountaineering in the US.

We propose that the guidelines be modified so that a process is clearly identified. The process outline would state that all areas remain open until an MRA indicates that closure is necessary.

Local Climbing Organizations (LCOs) often collaborate with Land Managers in order to improve an area. For example, the EICC has been putting temporary WAG bag dispensers in a local climbing area on USFS land for the past several years. This area is not just used by climbers. Climbers proactively decided that waste management and education was very important there. This was done with the knowledge of the local USFS office.

Many climbers have deep historical, environmental, and site knowledge in the area in which they climb. We propose that the draft Directive specify that all climbing management plan be created with prior extensive consultation with local climbers.

The East Idaho Climbers Coalition represents many climbers with interests in recreating on USFS land. Like them, the EICC is very concerned that this draft Directive will forever change practices that have been accepted for 60 or more years, and will detrimentally affect all users.