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Organization:

Title:

Comments: Hello, I recreate on USFS land on a regular basis, most frequently via hiking, backpacking, and mountaineering on the eastern escarpment of the Sierra Nevada (Inyo NF), but also via rock climbing in various USFS lands throughout southern and central California, primarily non-wilderness. I disagree strongly with the proposed restriction on the placement and replacement of fixed anchors to only existing climbing opportunities required by FSM 2355.31 Item 3. I also disagree strongly with FSM 2355.21 Item 12 and FSM 2355.32 in their entirety. I think that these sections of the directive as written are not realistically enforceable. I recommend that these sections of the directive be rewritten to direct case-by-case application of an MRA only when concerns are raised about an unusual hazard or a particular effect on a "sensitive [resource] such as [a] cultural [resource] or nesting bird habitat" being posed by a specific fixed anchor or route. As part of this change, I recommend that if specific areas are known wherein no new development of climbing opportunities will be approved due to "sensitive resources" or other considerations, the extent of such areas must be made known to the public so that there is minimal confusion and so that the application of the MRA process, if needed, is simplified. I believe that these revisions would still provide the Forest Service with the ability to effectively manage climbing opportunities in general, and fixed anchors in particular, while reducing the administrative burden of the directive and more clearly communicating to climbers the extent of likely allowable usage. Thank you.