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Comments: To whom it may concern at the United States Forest Service:

Please accept these as the official comments of the Climbing Association of Southern Arizona (CASA) regarding the "Proposed FSM 2355 Climbing Directives". CASA appreciates the opportunity to comment on these proposed management changes that directly impact our members and the greater Southern Arizona climbing community. CASA also applauds the agency for continuing to create a collaborative atmosphere surrounding management changes.

The Climbing Association of Southern Arizona (CASA) is a 501c3 organization based in Tucson, AZ that represents a diversity of over a thousand regional rock climbers. Since established in 2015, CASA has continued to build a strong collaborative relationship with the Coronado National Forest solidified through dozens of volunteer stewardship events on Forest land. These events span from litter clean-up and graffiti removal to system trail maintenance and erosion control at climbing areas. CASA also has an active anchor replacement team that replaces unsafe and aging hardware on legacy climbing routes in the area. A significant amount of community resources has been committed to these anchor replacement and community stewardship efforts.

Rock climbing in the Southern Arizona region has a long and storied history that pre-dates the 1964 Wilderness Act. For over seven decades, rock climbers have been establishing routes on the region's towers and walls. Many of these climbing routes are iconic for the area and represent an important perspective on the history of climbing itself, and an important recreational "coming of age" experience for newer climbers in the region. Over this time period, there have been very few negative interactions between rock climbers and the USFS or NPS, or with other users, either within or outside of designated wilderness. The Coronado National Forest's Santa Catalina Ranger District celebrates rock climbing on its homepage as a major Forest recreational activity.

The proposed management changes would appear to prohibit fixed anchors in wilderness by designating them as "prohibited installations". This change goes against nearly sixty years of managing them as accepted and necessary means of maintaining safety for well-accepted recreational uses such as rock climbing. Section 4(b) of the 1964 Wilderness Act clearly states that "Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use". The presence of wilderness climbing rangers and wilderness climbing management plans in the National Parks, for instance, clearly demonstrates that rock climbing is a well-accepted and recognized recreational use of designated wilderness. Many of Southern Arizona's most historic and popular climbing routes exist within designated wilderness and represent a significant recreational opportunity for the public. Prohibiting fixed anchors on these routes would diminish these well-established recreational and sustainable opportunities and could create unsafe conditions for future ascents.

The approval of new or replacement of existing fixed anchors in wilderness would require a Minimum Requirements Analysis (MRA). This is a cumbersome and expensive process that is unnecessary for managing sustainable climbing routes and could open the USFS up to even more expensive litigation. More importantly, the MRA process and prohibition of new fixed anchors would threaten public safety by prohibiting climbers from making critical real-time safety decisions during a climb. Much of the rock that climbers routinely traverse in our region is prone to breakage, dislodgement, or other changes, thus robbing climbers of the ability to make these decisions presents a serious safety hazard in our area.

As stated earlier, one of CASA's community programs involves routine maintenance of fixed anchors on area climbing routes. The USFS does not have the expertise to determine which fixed anchors are necessary, how or

when they should be maintained, or other critical climber safety information.

Furthermore, the proposed rule changes mandate that the Forests create climbing management plans (CMPs), yet the changes do not come with any funding attached. Thus, already resource-strained agencies like the Coronado National Forest will not be able to adequately manage rock climbing. The proposed management changes would present unnecessary red-tape that would create unsafe condition while CMPs are developed and MRAs are conducted for each fixed anchor (again, both without any identified funding).

Alternatively, CASA proposes that each existing fixed anchors within designated USFS wilderness be considered permitted and appropriate until it can identify through a comprehensive climbing management process which fixed anchors would be considered prohibited installations. Furthermore, CASA recommends that the climbing community continue to be involved in the collaborative planning process with the Coronado National Forest in the approval or prohibition of each fixed anchor.

While CASA is happy to see that the proposed management changes cement rock climbing as an "appropriate use of NFS lands", it is concerning that the language in the proposed changes regarding non-wilderness lands is vague and indistinct. New fixed anchors and replacement of existing fixed anchors in non-wilderness would appear be restricted as well. This policy would restrict the placement and replacement of fixed anchors to established "climbing opportunities" and would limit new anchor approvals only for new climbing opportunities that have been evaluated for natural and cultural resource impacts. The proposed changes poorly define "Climbing opportunity" as, "A user-created or primarily user-created dispersed recreation area on NFS lands with no, minimal, or limited Forest Service investment or amenities where climbing may be performed." This standard is highly subjective and will be nearly impossible to manage and enforce.

Existing non-wilderness fixed anchors and fixed equipment may be used without restriction when consistent with the applicable climbing management plan, except in areas closed to climbing. There is not any proposed funding to implement these management changes, so the development of a climbing management plan is in question. Nearly 30% of America's climbing (over 10,000 discrete climbing opportunities) is located on US Forest Lands, but only a few USFS climbing areas have an "applicable climbing management plan." It is unclear whether this new standard also applies to wilderness anchors as well. Most of Southern Arizona's climbing opportunities are on USFS lands. CASA wants to ensure that these opportunities are maintained, and that the climbing community is directly involved in the decision process.