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Comments: Overall, I agree with the content of the proposed draft FSM 2355 Climbing Directives. As a climber, avid outdoorsman, and conservationist, I believe that a balance must be found between protecting natural resources and having life enriching experiences in the outdoors, that invariably have impacts to the landscape. Rock climbers and outdoor enthusiast alike are all stewards of the public lands, whether they realize it or not. Each visitor to a given outdoor space must take personal responsibility for their actions and consider the collective impacts they are contributing to during each visit to the lands they cherish.

As a user group in general, rock climbers, alpinists, and backpackers are uniquely able and willingly take on the responsibility of being good land stewards of the land in partnership with USDA Forest Service personnel. This is apparent because of the large body of evidence and decades of relationships amongst these various groups nationwide and through documented history. Rock climbers take this responsibility seriously, often looking for ways to reduce the collective impacts of climbing on a given area and giving back through volunteering under USFS direction.

Providing climbers with more information and reports about the impacts they are having to wilderness areas and non-wilderness areas will help them make better decisions over time, and is a primary reason why I'm in support of this directive. Many forest units that offer climbing opportunities do not currently have insufficient information on the climbing resources in their jurisdiction. Rock climbers and alpinists are willing to partner with USFS personnel to address impacts to natural and cultural resources, but need technical guidance and the ability to see the implication on the broader landscape, with a convincing line of reasoning. Local climbing clubs and organizations continue to be willing to partner with USFS to ensure that a high level of care is afforded to the long list of treasured places and recreational resources under joint care.

Specifically, I agree with the draft policy's stated purpose, and directives as they relate to the installation of new climbing hardware, especially in wilderness areas. I would, however, like to underscore the need for climbers to leave behind gear under emergency situations. While this is provided for in the directive, I think that it is worth noting that special attention will need to be paid to this topic to ensure that climbers remain able to use minimum impact gear such as slings and rappel rings or carabiners to rappel out of dangerous conditions under emergency scenarios.

It will also be absolutely critical for USFS districts and areas with well known climbing destinations to communicate the intent and planning process for addressing climbing management goals within local management units. The climbing community is terrific source of climbing route location data, use patterns, safety concerns, etc. I believe that the proposed climbing directives chart a reasonable course for protecting wilderness character and resources from unacceptable impacts while also considering the nuances of climbing history and the needs of the climbing community. However, more funding and USFS resources will be needed to effectively address the needs outlined in the directive.

One section of FSM 2255 is unclear and needs revision. Section 2355.31 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment

Outside Wilderness is not clearly written. The first sentence of subsection 3 is uncoherent and needs to be amended to eliminate confusion. The first sentence seems to be in contradiction with the following sentences.

3. Restrict the placement and replacement of fixed anchors and fixed equipment to established climbing opportunities and to approved new climbing opportunities that have been evaluated for natural and cultural resource impacts. Allow placement and

replacement of fixed anchors only for purposes of belay, rappel, traverse, resource protection, or aiding in ascent and descent. Do not allow extensive or arbitrary placement and replacement of fixed anchors and fixed equipment without regard to rock features that provide natural opportunities for ascent and descent, such as where fixed anchors and fixed equipment are placed or replaced at a location that is otherwise climbable purely to make the climb easier, as opposed to at a location that is not otherwise climbable to enable a climber's ascent and descent of a climbing route identified in the applicable climbing management plan.

Please direct local USFS staff to continue outreach with the climbing community and individual local partners to address climbing management. We greatly appreciate the relationship with USFS staff, and actively desire many of the same conservation outcomes and sustainability of recreational use opportunities on public lands.

Gratefully,

Zach Anaya