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Comments: As an avid rock climber, outdoorsman and general enjoyer of nature I have had the fortunate opportunity to recreate on the lovely lands managed and maintained by the USFS. I am young and hope that I'm able to share these recreational experiences with my future children and have them participate in the same activities I enjoy. In order to do so this will require management and maintenance of Forest Service land and recreational opportunities like trails and climbing routes. In the context of climbing and the FSM 2355 directive I am supportive of increased preservation of the land we recreate on and I do generally agree that the directive comes from a place of caring and trying to do the right thing. I recognize the significant work that went into creating this directive. It is difficult to include so many diverse perspectives of land managers, recreational users of all kinds, etc. and the opportunity for public feedback takes this one step further. I would like to thank the forest service for that.

I would like to provide my input on the impacts of this directive as a climber with experience in well climbing and the development, maintenance, and use of climbing routes utilizing the bolts and anchors being discussed in this directive. This activity is an intimate one that develops a deep caring and appreciation for the rock as well as the bolt mounted into the rock. These bolts need to be in safe condition as well as minimal in their placement. The maintenance and development of these routes along with all associated management of such activities is costly in time, effort, energy, and money.

The Forest Service has a finite amount of these resources and the staff are underpaid and overworked already. The Forest Service already has a limited and strained budget. To execute the changes outlined in this directive would be an expensive endeavor and further strain limited resources. The burden of creating individual "climbing management plans" is considerable and has the potential to be unequitable as different Forest Service locations have different expertise and resources. Additionally, the follow up and reoccurring work and cost of assessing permits makes a complete denial of bolting and closure of climbing routes likely. Significant negative impacts to climbing and climbers would result from such a stance including not being able to share this sport with future children and climbers, increased traffic impact and congestion on other maybe less well managed lands and the like. I am sure there is common ground between the Forest Service and climbers who trust their lives to bolts and fixed hardware to address our concerns with the proposed FSM 2355 directive.

The main concern regarding this proposed directive is the potential of how this directive will be executed. Climbers like myself who use fixed anchors are concerned about the increased administrative burden, potential wait times being so long or too demanding on the Forest Service that a closure or prohibition on maintaining or changing fixed anchors occurs. This could seem like an attractive option for already overworked Forest Service employees. Within the prerogative that FS Rangers and Supervisors hold to determine if routes and their bolts will receive continued use, also lies the fear of their fate hinging on these individuals. The lack of additional funding provided by this directive makes enacting such a prohibition more likely and there would be significant reoccurring costs with maintaining a permit system as suggested in this directive. The current directive doesn't provide appropriate funding to enact the ideal policy of creating and maintaining an MRA (which would be significantly resource intensive) for all the lands and climbing routes that fall under Forest Service management. Due to this lack of funding this policy should not be enacted.

I would like to see the United States Forest Service, Regional Foresters, Forest Supervisors, and District Rangers to work with climbers and climbing organizations to create a more equitable and less resource intensive process. Climbers and their advocacy organizations may be able to help lighten the demands on Forest Service staff and in general support management activities.

Thank you, for taking care of such areas I have enjoyed and hope to continue to enjoy with my future friends and children. And thank you for your consideration of my input as a climber, concerned citizen and nature lover.

Lucca DeBiaso