

Data Submitted (UTC 11): 1/27/2024 1:56:08 PM

First name: Jeremiah

Last name: Moree

Organization:

Title:

Comments: Hello,

I am glad to see that the agency is including climbing in management plans. It is good that this long standing recreation gets attention and some regulation.

One concern I have is that the local forest supervisors are suffering from a lack of resources and will take any opportunities to ban climbing as they may see it as legally risky and a drain on resources. We have seen this in various locations around the country.

Page 11 of Proposed FSM 2355 Climbing Directives section 2355.21 states that the climbing management plan is only to be formed "where the District Ranger determines that climbing is causing adverse resource impacts or use conflicts". What stops them from saying that climbing itself is an adverse impact?

Page 6. item 7 and Page 12 #12 explicitly states that the climbers are responsible for replacing bolts but that the Forest service is responsible for determining if that is necessary. This is unreasonable and dangerous.

I am concerned that a safety hazard will be created when hardware that is rusted or damaged cannot be replaced until an analysis is completed. We all know how slow these things are. Existing bolts should be replaceable at any time. Restricting bolt replacement is going to get someone hurt or killed.

Item 9 states that special use permits will be issued to 'increase visitor climbing opportunities'. That makes no sense. requiring permits will 'decrease' opportunities.

Page 8 section 2355.04c.3 says mandates 'effective working relationships with climbing organizations' which is contrary to telling them "You cannot replace bad hardware--maybe next year."

Section 2355.04d.5 mandates closing areas under 'adverse affects'. Fixed anchors are not inherently adverse and this should be called out.

Thank you for considering my opinion on these matters.

JT Moree