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To whom it may concern,

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. The reality is that these recreational experiences invariably have impacts to the landscape. Each visitor to a given outdoor space must take personal responsibility for their actions and consider how their interaction with those spaces contribute to the changes to the lands they cherish over time.

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. This is apparent because of the large body of evidence of past collaboration between these user groups and the federal land management agencies; including the USFS, NPS, and BLM. Decades of collaboration amongst these various groups nationwide and through documented history have proved beneficial to both recreationist and land managers. Rock climbers take this responsibility seriously, often

looking for ways to reduce the collective impacts of climbing on a given area and giving back by volunteering their time to steward resources on public lands, under the guidance and direction of USFS personnel.

Providing climbers with more information and reports about the impacts occurring within wilderness areas and non-wilderness areas will help them make better decisions, and is a primary reason why I'm in support of this directive's initiative. Many forest units that offer climbing opportunities do not currently have sufficient information on the climbing resources within their jurisdiction. Fortunately, rock climbers and alpinists great take care to document climbing route details and would be willing to partner with USFS personnel to provide data and context to existing climbing resources. The climbing community is terrific source of climbing route location data, use patterns, safety concerns, etc. The climbing community is also willing and able to partner with USFS personnel to address impacts to natural and cultural resources by leveraging the large labor pool of dedicated land stewards, some of which a quite knowledgeable and savvy natural resource protection specialists. Local climbing clubs and organizations, as well as these experts with technical skills, will certainly continue 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 our joint care.

The draft policy's stated purpose, and directives as they relate to the installation of new climbing hardware needs refinement. I feel a need to underscore the importance for climbers to be permitted leave behind gear under emergency situations, including in wilderness areas. 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 nylon slings and rappel rings or carabiners to rappel out of dangerous conditions, which is statistically infrequent, and only necessary under emergency scenarios.

It will also be critical for USFS districts and areas with well-known climbing destinations to clearly communicate the intent and planning process for addressing climbing management goals within those local management units. I believe that the proposed climbing directives chart a reasonable course for protecting wilderness character and resources from unacceptable impacts through time while also considering the nuances of climbing history and the needs of the climbing community. However, more funding from Congress will need to be allocated

to the USFS in order to effectively address the needs outlined in the directive.

Having said that, I do feel that 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 and needs to be clarified immediately.

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.

I urge USFS staff to continue outreach with the climbing community and individual local partners to address climbing management. Considerations should be made in relation to a certification process for rock climbers with the appropriate skills to replace fixed hardware to demonstrate that knowledge and earn a certification, or license to continue caring for climbing hardware. Many of the individuals that are currently placing fixed hardware would be willing to demonstrate their capacity, similar to those who pass a test for a hunting license or become a certified arborist. Placing bolts is a trade skill and is of value to the USFS and the climbing community.

We greatly appreciate the relationship with USFS staff, and actively desire many of the same conservation outcomes and continued sustainability of recreational use opportunities on public lands.

Gratefully,
Zach Anaya