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Peter Mali, National Wilderness Program Manager

United States Forest Service

United States Department of Agriculture

Washington, District of Columbia

Submitted via USFS Portal

Re: Forest Service Manual 2355

Mr. Mali:

Thank you for the ability to submit comments on the "Climbing Directives" presented in Forest Service Manual 2355.

The Boulder Climbing Community (BCC) and its Interest in FSM 2355

The BCC is primarily a stewardship organization representing tens of thousands of climbers in the Front Range of Colorado, from Colorado Springs to the north edge of Rocky Mountain National Park. Annually, we organize over 1,000 volunteers to perform over 8,000 hours of volunteer service. For the past 9 years, we have worked closely with the 100,000-acre Boulder Ranger District of USFS to be the primary stewards of the 17-mile-long Boulder Canyon in the Arapaho and Roosevelt National Forests. Boulder Canyon is among the most historically significant climbing resources in the United States with over 2,500 climbing routes/opportunities at over 120 unique areas/crags. The BCC for over 8 years has partnered with the Boulder Ranger District via a Cost Share Agreement and Annual Operating Plan. In 2021, we finalized a multi-year endeavor to add 5 miles of climber access trails to the USFS Trails System Map. We have in place a rolling 5-year plan to stabilize and maintain these trails. In addition, our partnership allows us to take responsibility for monitoring golden eagle nests, mitigating human waste, removing graffiti, educating the community, organizing volunteers, and much more. The only stewardship work we have not been able to legally complete is fixed hardware replacement as it was previously defined as "damaging any natural feature or other property of the United States" in 36 CFR 261.9(a)

BCC Comments on FSM 2355

We commend the USFS for formally recognizing climbing as "an appropriate use of NFS lands" (section 2355.03) and acknowledging that the "placement and replacement of fixed anchors and fixed equipment are appropriate outside wilderness" (section 2355.31). The proposed directive, once finalized, will allow organizations like us to better steward climbing resources outside of Wilderness Areas by allowing us to replace aging, substandard, and unsafe hardware, with clear guidance as to their legality.

Comments relating to non-Wilderness Areas

Our comments will address the roughly 80% of NFS land not in Wilderness, as these are the primary areas we work in. We believe the following topics should be addressed and clarified in a finalized plan:

Necessity of a Climbing Management Plan:

FSM Sections 2355.03 and 2355.21 seem to differ on whether a climbing management plan is always needed. Specifically, is a climbing management plan needed if no adverse conditions exist? We believe that if no adverse conditions exist, a climbing management plan should be optional. That empowers each district to exercise its discretion on whether to devote the resources to creating such a plan, in light of the situation at a specific area. However USFS resolves that question, there is value in clarifying the ambiguity so that each district and the public know what is required, and what is not.

As described above, the BCC already engages in many of the practices outlined as necessary to a formal climbing management plan: 2355.33 - Minimizing Impacts from Climbing Activities, 2355.34 - Public Safety, 2355.35 - Sanitation, and 2355.36 - Trails. If these activities are already in place and documented elsewhere, is a climbing management plan needed? Here, too, we believe the answer should be no. If activities are already well controlled and documented, to the satisfaction of the local district ranger, that district ranger ought to have the discretion not to create a climbing management plan.

#### Interim Policies:

Climbing management plans will take considerable time to develop with the level of detail required to satisfy the objectives of the FSM. In the Boulder area, for example, the vast number of climbing areas within the local district add to the complexity of developing a plan that is well-tailored to the varying conditions that exist. Given that time requirement, it is important to clarify that District Rangers have full authority to implement their own interim policies as they make progress toward climbing management plans. It is not in the best interest of conserving natural resources and safety for climbers to have such policies left in limbo during the potentially lengthy period required to develop formal plans. Each local District Ranger must have the necessary authority to continue and adjust local policies and practices, as a formal plan is being developed

Thank you for considering these comments. Please do not hesitate to contact us ([Kate@boulderclimbers.org](mailto:Kate@boulderclimbers.org)) if you have any questions or would like to discuss these issues further.