

Data Submitted (UTC 11): 1/30/2024 5:49:08 PM

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Comments: To Whom It May Concern,

The proposed FMS 2355 Climbing Directive is a redundancy of strategies and practices that Forest Service land managers are already using, particularly when it comes to climbing in Wilderness. Management for any activity occurring in Wilderness is covered in the Wilderness Act and further direction for the Forest Service is covered in FSM 2300, Chapter 2320. Climbing has been and will continue to be an appropriate use of NFS lands and Wilderness areas across the United States when managed appropriately at the local level (which is already occurring), there is no need to write a directive that states this. For example, Granite Mountain climbing area in the Granite Mountain Wilderness of the Prescott National Forest of Arizona, this climbing area is in Wilderness and in valuable peregrine falcon nesting habitat. The Wilderness manager, wildlife biologist, local researchers, and climbers work together to provide primitive and unconfined recreation via climbing opportunities while also managing for the falcons, and successfully using forest closures during nesting times.

While climbing can appropriate use in Wilderness, it is not appropriate in every place and fixed equipment/ anchors are not compatible with what is written in the Wilderness Act; fixed climbing equipment/ anchors are considered installations under the Wilderness Act- section 4(c). The Forest service does not need to reinterpret the Wilderness Act and its intent, this has been clear for nearly 60 years. Land and Wilderness managers should not be pressured to conduct an onslaught of MRA's because climbers and climbing organizations feel it is "necessary" to have fixed equipment and/or anchors to realize the climbing opportunities in Wilderness with the publishing of this directive. This is not the intention of the concept of Wilderness as described in the Wilderness Act to which we have entrusted land managers with stewarding. Wilderness is described to be a way of assuring that increasing population, expanding settlement, and growing mechanization does not occupy and modify all areas within the United States, Wilderness lands need to be preserved and protected in their natural condition. This proposed directive starts the process of slipping away from this intent in the Wilderness Act and calls for more evaluation and acceptance of nonconforming installations.

Just like land managers, the public and NGOs should use restraint when recreating in Wilderness so that we may maintain the Wilderness resource and its character for today's and future generations. Part of the restraint is accepting that every wall, canyon, and piece of rock does not need to be climbed to be enjoyed as part of the Wilderness experience. Wilderness is untrammelled, natural, undeveloped, and provides an opportunity for solitude or a primitive and unconfined type of recreation.

Thank you,

A Wilderness Steward and Climber