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First name: Rebecca

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Organization:

Title:

Comments: Dear US Forest Service,

I am a career outdoor educator and avid canyoner, hiker, paddler, and xc skier. In my current job I work on behalf of 3000 volunteer instructors who teach hiking, climbing, skiing, paddling, and a variety of other outdoor pursuits. I work directly with more than a dozen land managers to secure special use permits and to partner on stewardship and education efforts.

I have had the privilege of truly transformative outdoor experiences that have shaped who I am today. They have strengthened me as a confident and compassionate person, and they are the reason I teach about and advocate for our wild places. My understanding of, and appreciation for, ecosystems, watersheds, invasive species, the impacts of climate change, and a long list of other environmental topics, all stem from time being immersed in challenging, humbling, and awe-inspiring outdoor environments. The challenges and team successes of climbing, paddling, and canyoning have impacted me so deeply that I have committed much of my life to preserving these places for others, and to work that makes these opportunities available to as many people as possible. As a volunteer canyoning instructor, I spend much of my energy working to make the sport accessible to more people.

Time spent in wilderness and wilderness-like spaces supports mental, physical, and emotional health. Time spent as a team in challenging natural terrain builds all of the executive functions that screen-bound adults and kids so desperately need: perseverance, care for others, resilience, self-reliance, problem-solving, and community - to name a few.

This proposed new guidance is unnecessary and unrealistic, and it poses a threat to millions of transformative experiences that can improve the health of our nation.

Section 2355.01, bullet #3

This section chooses misleading language, omitting the stated purposes of Wilderness. This section should be edited to include: "This act specifies that wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use"

This National Guidance is Unfunded

We are living in a time where districts are regularly putting permitting processes on hold and even reducing services due to a lack of resources. Just this year in Washington, one forest issued a moratorium on special use permits due to a lack of resources. Another told one guide service "I think you meet the requirements for a permit, but we may or may not have time to process your application". A decade ago, nearly all of Region 6 had a moratorium on permits because they did not have the resources to issue them. It took 18 months of intensive meetings between Forest Service staff, nonprofit groups, and climbing groups to work together to overcome this moratorium. This only happened thanks to outstanding leadership at the regional office. This is unacceptable. Our forests have great teams who simply don't have the resources they need.

In this context, it is totally unrealistic to expect district staff to have the resources to engage in an onerous and bureaucratic MRA process. One possible outcome is USFS staff engaging in an MRA process but not having the resources to do a thorough job. Districts that engage in anything but a thorough MRA process are at risk of lawsuit from an interest group who is unhappy with the outcome, which will unnecessarily lead to taxpayer money being spent in legal action. Another, more likely outcome, is a moratorium on permits for new fixed anchors. "We don't have the resources to issue you a permit" is an unacceptable response, but it will become the reality if our forests are required to conduct an MRA for every fixed anchor. As noted above, it is already a reality for other recreation permits. Unfunded mandates are irresponsible. NFS should remove the prescriptive language

requiring an MRA unless a specific, reliable, and sufficient annual funding source is identified, and passed into law prior to the enforcement of this guidance.

This guidance is unnecessary and disempowers individual land managers.

Across the country, land managers partner with local climbing, caving, and canyoning organizations to manage these special resources. From social trail remediation to bolting, land managers and local recreation groups have worked closely to strike a difficult and important balance of protecting the resource while providing the public recreational and educational opportunities that wilderness and non-wilderness areas alike are devoted to.

Just as established trails concentrate use and prevent social trails, fixed anchors direct climbers, canyoneers, and cavers to the safest, most sustainable path. Leave no Trace teaches us that just 10 people traveling on the same path can create a social trail. Similarly, 10 people using a retrievable anchor around a tree will create erosion while accessing the tree and damage to the bark of the tree.

We are on the verge of new law coming out of congress as part of AORA and the EXPLORE Act that will require land managers to have climbing management plans. This is yet one more reason this guidance is unnecessary. The recreational community supports thoughtful regulations on our public lands. Prescriptive processes handed down at the national level are not an appropriate approach, and will not lead to further preservation of wilderness.

Definitions are Vague

Climbing is defined as "a wide spectrum of techniques used to ascend, descend, or traverse technical rock and frozen terrain, including but not limited to bouldering, rock climbing, mountaineering, canyoneering, and ice climbing."

Does this definition include caving? The caving community deserves to understand what regulations they will be expected to adhere to. The definition of "climbing" should be specific and comprehensive, so that the scope of the policy is clear.

Climbing opportunities are defined as "user-created or primarily user-created dispersed recreation area on NFS lands with no, minimal, or limited Forest Service investment or amenities where climbing may be performed".

Section 2355.03 states: "A climbing management plan can cover a single climbing opportunity or multiple climbing opportunities across a variety of landscapes." However, the term climbing opportunity fails to define what the scope of a "single climbing opportunity" can be. Can mountaineering routes and sport crags be included in a single "climbing opportunity"? Can a district include all established canyons in that district as a single climbing opportunity? Or must each individual canyon be deemed a single climbing opportunity?

The definition of "climbing opportunity" needs further clarification about what constitutes a climbing opportunity and how to draw the boundaries around each opportunity.

Section 2355.04d indicates that Forest Supervisors are responsible for "planning, developing, and managing climbing opportunities". What is the timeline for this? This is important because the process, according to this guidance, for establishing new climbing opportunities is extremely onerous. How will a Forest Supervisor know that they have established a comprehensive inventory of existing climbing opportunities throughout the entire forest? It seems there's a risk that some existing climbing, canyoning, or caving routes might be forced to go through a "new opportunity" process simply because a Forest Supervisor did not know of their existence.

Bullet #3 in 2355.31 states: 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

A transition plan needs to be added. How does the NFS know they've identified all existing opportunities? When does an existing canyon need to be treated as a "new opportunity" simply because the NFS staff failed to identify it? A process needs to be written for existing climbs, canyons, and caves that are excluded from the inventory of "climbing opportunities". It would be unreasonable for those resources to be subjected to a "new opportunity" process simply because they were omitted by the Forest Supervisor.

2355.21 Climbing Management Plan

Section 2355.04e indicates that District Rangers are responsible for "As funding and resources allow, developing climbing management plans for climbing opportunities in their ranger district for which a climbing management plan is required (FSM 2355.21)" However, 2355.21 does not indicate when a climbing management plan is required. It simply repeats "as funding and resources allow" and indicates the need to prioritize wilderness areas and areas of adverse resource impacts or use conflicts. This policy needs to indicate who is responsible for determining when a climbing management plan is required, and how that determination is made.

The policy also needs to indicate that the absence of a climbing management plan does not inherently restrict use.

Bullet #2 in 2355.31 states: The placement and replacement of fixed anchors and fixed equipment must be consistent with any applicable climbing management plan, including requirements to reduce adverse resource impacts.

Bullet #4 in 2355.31 states: Existing fixed anchors and fixed equipment may be used without restriction when consistent with the applicable climbing management plan, except in areas closed to climbing.

Bullet #6 in 2355.31 states: Motorized rock drills may be used to the extent they are consistent with the applicable climbing management plan.

Language needs to be added to specify "In absence of a climbing management plan, fixed anchors and fixed equipment may be placed, replaced, and used without restriction, and motorized rock drills may be used without restriction"

2355.32 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness

In addition to this policy being unfunded, as noted above, it fails to fully contemplate all sports included in the definition of climbing, canyoning, caving, highlining, and other sports that require fixed anchors by forcing an unfunded bureaucratic process that is not designed for the realities of many fixed anchors.

Outside of a sport climbing environment, bolts, webbing, and other "fixed anchors" are in fact small, usually temporary protection in an ever-changing environment. Mountains crumble, canyons and caves flood, and UV rays destroy webbing, rendering these "fixed anchors" truly temporary. For this reason, it is inappropriate to categorize "fixed anchors" as "installations." The terrain changes dramatically in some of these areas with the seasons. While the "emergency replacement" provision is useful, it is insufficient for canyoning, and likely other roped pursuits. The first party through a canyon in a given season will see anchors that need to be replaced or even re-positioned. As the terrain changes with floods, anchors that were once safe may put the rappeller in hazardous terrain. Anchors that once reduced erosion impacts may no longer be accessible without causing erosion. The canyoning community cares deeply about protecting our canyons, and will work together with land managers to maintain anchors in a way that preserves the wilderness character. The canyoning season is incredibly short, and a team will need to go in and fix anchors within two weeks of the first descent of the season, so that it is ready for peak season parties to descend without causing further damage or risking injury. An

onerous process like an MRA renders this practice of care for the resource and each other impossible. If an MRA is required, it must be done at a programmatic level to allow for seasonal anchor maintenance that is needed to protect the resource. The absence of an MRA due to lack of resources should not prevent this critical annual maintenance. It is far better for the environment, safety, and wilderness character to allow a team to remove bad anchors, replace them with good anchors, prioritizing the same location if practical, and reposition anchors as needed for safety or impact reduction.

Section 2355.32 #7 states: "Prohibit use of motorized rock drills and practices such as chipping and use of glue, epoxy, or other fixatives for hand holds and foot holds in climbing management plans." This language should be revised to: "Prohibit practices such as chipping hand holds, or use of fixatives for hand holds or foot holds in climbing management plans." The Wilderness Act, supported by NPS DO41, already requires an MRA process for the use of motorized rock drills. Power-drilled bolts are safer and less destructive than hand-drilled bolts, and in some cases are the minimum requirement for the climbing activity. Depending on the rock type and environment, glue-in bolts are the most sustainable option. The language of this bullet #7 needs to be limited to prohibiting artificial holds.

Here are two alternatives that would support the Wilderness Act and the objectives of this document.

Preferred option: table this guidance until 2025. Give congress a chance to pass a more reasonable and relevant law that leads to thoughtful climbing management plans.

Option B: This guidance should be edited as follows:

Identify a specific, reliable, and sufficient annual funding source to support this guidance

Eliminate language that allows district staff to restrict or prohibit fixed anchor placement or replacement until a planning process is completed

Add language that clarifies the definition of "climbing opportunity"

Add language that clarifies the determination of when a climbing management plan is required, and who is responsible for the determination

Add language that protects existing climbing opportunities that are omitted from the district's inventory of climbing opportunities

Add language that allows for unrestricted use in absence of a climbing management plan

Add language that allows for responsible, timely anchor maintenance in both wilderness and non-wilderness

Include language that puts the responsibility on the district, not the public, for communicating and facilitating this guidance. This language should include:

Minimum communication requirements for a policy to be enforceable (eg. the climbing management plan must be posted on the website with an application link)

Minimum response requirements indicating that after a certain amount of time, if the park does not respond to a permit request, a permit is assumed granted

Maximum timeline for an MRA process, after which a permit is assumed granted

Include language that forbids any kind of moratorium on fixed anchor permits.

Thank you for reading and considering these comments. The guidance as it is currently written will work against the aims of the Wilderness Act of 1964 by making it harder for people to safely access these incredible places, and harder for our communities to partner with land managers to protect these natural resources..

Sincerely,
Becca Polglase