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To the US Forest Service:

The following are my comments regarding the draft amendment to the Forest Service Manual 2300 that would add section 2355 regarding the management of climbing opportunities on National Forest System lands.

Thank you for the opportunity to provide comment on this important management guidance. As the draft guidance notes, climbing is an appropriate use of National Forest System (NSF) lands and has long been an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character of many US Forest Service managed wilderness areas. Given the growth in participation levels and changes in activity patterns in climbing more broadly in recent years, it makes sense for the Forest Service to clarify its management of climbing and seek to establish guidance that can address both the need to continue facilitating climbing as an important mode of fulfilling the recreational purposes of National Forest System lands and to mitigate its potential impacts on natural resources.

My Relevant Background

I have been a dedicated recreational climber for more than thirty years and have climbed extensively on National Forest System lands around the country, including in multiple wilderness areas. I have climbed most extensively in the Pike-San Isabel National Forest and in the Indian Peaks Wilderness Area within the Arapahoe-Roosevelt National Forest near my home, as well as in the White River National Forest in Colorado and the White Mountain National Forest in New Hampshire. I value the solitude provided by climbing in remote and undeveloped areas such as the Indian Peaks Wilderness, and the primitive, adventurous form of recreation that climbing on many National Forest System lands can provide. While I have always practiced "clean climbing" techniques and am primarily an alpine and traditional climber, in multiple instances I have relied on rappel anchors that were left in place to facilitate exit from high alpine climbing routes, or I have used bolt anchor stations that were installed to increase safety and reduce cumulative damage to the surrounding rock and vegetation. Leaving in situ such judiciously placed fixed climbing hardware to support safety for climbers in wilderness settings is very important and should continue to be supported through whatever regulations and management guidance the Forest Service adopts.

In addition to climbing in wilderness, I have also developed "sport" climbing routes in appropriate areas on public lands in the Front Range of Colorado and have therefore installed bolts for fixed climbing anchors. Participation in new climbing route development and installation of bolts for protection is very rare among climbers, the vast majority of whom have not and will not ever install a fixed anchor (bolt, piton, or other) in rock, even if they regularly use such fixed hardware for protection on climbing routes. I have intimate personal experience with the process of evaluating rock for installation of fixed hardware as well as the careful decision-making process about environmental context and overall appropriateness that precedes any such installation. On multiple occasions, I have investigated a new location for potential climbing route establishment, weighed the costs and benefits of facilitating future climbing in that location, and elected not to install any fixed hardware or establish a new climbing route. This is the norm among the small cadre of climbers I know who have ever placed any protection

bolts for climbing or established a new route: far more potential places for climbing are left undeveloped and not shared publicly than are developed and publicized.

I have also served for the last ten years as a volunteer on a citizen advisory committee for my local county open space department, which manages several of the most popular climbing areas in the country and has established a review process for all new fixed anchor placements for climbing and slack lining. The advisory committee reviews and makes recommendations on all applications for new climbing bolts, and in that capacity, I have been involved in the decision-making process for evaluating the appropriateness of climbing anchors in a variety of locations for a public land management agency that manages for both recreation access and natural resource protection, including wildlife habitat and sensitive species.

Finally, I have been a committed conservation advocate for many decades and have worked professionally in wildlife habitat protection advocacy. As a program director, campaign manager, and executive director for a regional conservation nonprofit advocating for endangered species and wildlife habitat protection in the Southern Rockies ecoregion, I regularly participated in the regulatory processes of the Forest Service, Park Service, and Bureau of Land Management (BLM) as a citizen and advocate through public comment, community organizing, and litigation to promote the expansion of wilderness areas in Colorado, Utah, Wyoming, and New Mexico, as well as pressing for Forest Service and BLM resource management plans to include the most protective provisions for the preservation of wilderness character in the face of extractive industry pressures and increased recreation impacts. I was personally involved in several campaigns to advocate for designation of new wilderness areas within the National Forest System and remain a staunch advocate for wilderness designation as a critical tool for preservation of wilderness values as well as wildlife and native species habitat.

Overall Comments

As a climber, conservationist, and wilderness advocate, I am pleased that the Forest Service continues to recognize that "climbing is an appropriate use of NFS lands" (2355.03 Policy, 1) and that part of the agency's management objectives should include "provid[ing] climbing opportunities that serve visitor needs" (2355.02 Objectives, 1). Furthermore, I am pleased that the Forest Service continues to recognize that "climbing has long been an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character of many NFS wilderness areas" (2355.03 Policy, 4) and that "the placement, replacement and retention of fixed anchors and fixed equipment are permissible in wilderness when it is determined they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character." (2355.03 Policy, 5).

Importantly, the draft amendment notes that "the placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act" (2355.03 Policy, 6, b). This clarification is important, as many times the judicious application of fixed anchors in wilderness areas can in fact do the opposite of impairing future enjoyment or violating the Wilderness Act. Instead, it can help to preserve natural resources by reducing wear on natural anchor points such as trees, facilitate the enjoyment of primitive or unconfined recreation for subsequent climbers, and improve safety and reduce impact on Forest Service resources by reducing the need for rescues and reducing the chance of damage to wilderness character resulting from accidents and subsequent rescue operations.

My main concerns with the proposed amendment to the USFS Manual stem from the attempt to define a "climbing opportunity" and to mandate that a climbing management plan must eventually be adopted for every climbing opportunity on NFS lands. While this would seem like an appropriate management framework on its face, in practice this will be difficult or impossible to enact, depending on how Climbing Opportunities are defined. It appears that the intention in the draft guidance is to adopt climbing management plans for every place that has one or more climbing opportunities within the entire National Forest System (see 2355.03 - Policy, item 3: "develop a climbing management plan covering each administrative unit or ranger district that has one or more

climbing opportunities").

However, if a "climbing opportunity" is defined as "a user-created or primarily user-created dispersed recreation area... where climbing may be performed" (2355.05 Definitions), then such locations requiring adoption of a climbing management plan are not limited to existing climbing locations, or even regularly used existing climbing locations, or even those existing climbing locations where current or anticipated near-future use is likely to cause or is already causing resource degradation or user conflict. Most, if not all, management units in the entire National Forest System would eventually need a climbing management plan under this policy. Indeed, climbing participation and climbing use patterns change over time, and there are many locations on NFS lands that currently do not have any established climbing opportunities but that could in the future.

Under this proposed policy, the USFS would eventually be required to create climbing management plans for every parcel of the National Forest System, and yet without a reasonable way to anticipate the exact nature of future climbing use in all places and the management needs of every future climbing opportunity, climbing management plans for currently unused places will be ineffectual or destined to be inadequate for the use that eventually occurs.

The guidance appears to clarify that climbing management plans for wilderness areas and for places where an existing climbing opportunity is causing adverse resource impacts or user conflict should be prioritized over plans for other locations, thus establishing a sort of order for eventually adopting climbing management plans for all places where climbing is occurring. This is a sound approach, and one that may well mitigate some of the impracticality of trying to adopt a climbing management plan for every spot on NFS lands where anyone has established climbing route of any kind, or could someday.

If the priority and funding given to adopting climbing management plans were clearly tied to a practical standard of imminent need for active management of climbing (for example, to address adverse impacts or visitor experience), then the proposed plan for using climbing management plans at the ranger district or unit levels might be more likely to provide useful management tools to address genuine needs without prompting the creation of unnecessary or impractical management planning guidance in places with little active need to manage climbing.

The caveat "as funding and resources allow" at the beginning of the description of Climbing Management Plans in section 2355.21 perhaps provides this practical standard for prioritizing locations in need of climbing management plans. However, this standard is incidental to the actual impacts of climbing on the ground in any NFS location and is not tied to a standard of need for active management, which not all current climbing locations on NFS lands require. Instead, funding and resources for USFS planning are subject to the whims of Congress to political forces beyond the control of Forest Supervisors and District Managers. I do see how this draft guidance attempts to give the USFS some clarity on which locations to prioritize first for climbing management planning and adoption, but I think the policy would be improved by 1) providing clear guidance on how to prioritize locations for the adoption of climbing management plans, since doing so for all or nearly all parts of the NFS will take considerable time, and 2) clarifying that, in the interim, climbing and the installation of fixed anchors and fixed equipment is NOT prohibited in locations that have not yet seen the adoption of a finalized climbing management plan.

In general, I am greatly heartened to see the emphasis at various levels within the proposed guidance on working collaboratively with local climbing organizations and on enlisting the help of local climbing communities in user education, climbing opportunity planning, and mitigation of adverse impacts at individual climbing sites. Local climbing organizations can be a valuable resource for Forest Supervisors and District Rangers in managing climbing and enacting the objectives of any climbing management plan adopted. Local climbing organizations can act as an important conduit for user education and information dissemination to climbers in each region. They also represent an important sounding board for ideas about potential aspects of climbing management at

any climbing opportunity and are a vital constituency for promoting acceptance of and compliance with any proposed climbing management plan among local NFS visitors. The success of any climbing management plan on a local level may well depend on establishing a positive working relationship with any local climbing organization that represents regional climbers, and collaboration with such organizations can greatly increase the chance of long-term success with any climbing management plan.

Comments on Section 2355.31 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment Outside Wilderness

I am pleased that the USFS specifies that placement and replacement of fixed anchors and fixed equipment can be appropriate, especially when they reduce adverse resource impacts, as they often can, and when they address safety concerns, as they often do. Because nearly all fixed anchors (e.g. bolts) are placed only where other, more temporary protection is not available and where their use will reduce impacts on surrounding resources (such as trees and rock features that may be damaged by being used as points of temporary protection or as rappel anchors, etc.), the draft guidance should make clear that the use of fixed anchors and fixed equipment should only be restricted or prohibited in any climbing management plan when their installation would cause unsustainable damage to the natural resources of the area. In such circumstances, their restriction or prohibition should be limited in geographic area to the minimum possible area needed to achieve resource protection.

I am extremely concerned, however, that the proposed guidance in Section 2355.31 at item 3 states that placement or replacement of fixed anchors and fixed equipment should be restricted to "established climbing opportunities and to approved new climbing opportunities that have been evaluated for natural and cultural resource impacts." In effect, this provision requires the establishment of a system of review and prior approval for the establishment of new climbing opportunities without providing guidance or funding to establishing such a review system. While I am actively involved in helping to administer such a review system for my county's open space and parks department by volunteering on a citizen advisory committee that reviews all applications for new installations of fixed hardware for climbing and slacklining, my county has delineated a clear permit application process for the public and has allocated adequate internal resources to administering this system. I fear the USFS may not be in a position to do so at the Forest and District level in many parts of the National Forest System without specific guidance for how such review systems should be implemented and without additional resources of staff time and budget being allocated to it.

Without any clear plan for facilitating the establishment of these sorts of review systems, the USFS could, in many locations, end up enacting a de facto ban on new climbing locations by simply not starting or finishing reviews of proposed new climbing opportunities in a reasonable timeframe. Please consider not restricting or prohibiting new fixed anchors and fixed equipment in new locations until their approval as new "climbing opportunities."

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

I am heartened to see the recognition by the USFS in the first point of guidance in this section that "[c]limbing, including the use of fixed anchors and fixed equipment, can fulfill important wilderness recreational purposes and can help preserve wilderness character by providing opportunities for primitive or unconfined recreation."

Furthermore, I am relieved to see in point 5 of this section the guidance that existing fixed anchors in wilderness may be retained and especially that emergency replacements of existing fixed anchors and fixed equipment may occur without prior approval through a Minimum Requirements Analysis.

However, this contradicts the implications of the language used in another section of the proposed draft. In the

section titled "Climbing Management Plan," the draft amendment proposes that a climbing management plan for a NFS wilderness area should "restrict or prohibit the placement or replacement of fixed anchors and fixed equipment in wilderness unless specifically authorized..." (2355.21 Climbing Management Plan, 12). In practice, this will be impractical to enforce in many places, but in particular the recommendation to prohibit or restrict replacement of existing fixed anchors could endanger climbers if existing anchors are allowed to degrade. Even if a procedure is established for review and approval of replacement of existing anchors, there are situations where an anchor needs to be replaced or repaired immediately to ensure safety for the existing climbing party, let alone subsequent climbers, and waiting for review and approval of a permit may be impractical or impossible. This exact issue is clearly what was contemplated in the drafting of point 5 of Section 2355.32. To the extent that Section 2355.21 and the language in point 5 of Section 2355.32 are in conflict, please resolve and specify the importance of allowing emergency replacement of existing fixed anchors without prior approval.

Similarly, I am highly concerned about the suggestion in point 6 of Section 2355.32 of the draft guidance that existing fixed hardware can retroactively be deemed inappropriate-after decades of existence within established wilderness areas with minimal or no effect on wilderness character, in many cases-and therefore be subject to removal. This is, of course, one of the points of greatest concern voiced by many organized climbing advocacy organizations, since the fear is that many classic climbing routes in wilderness areas could be removed. I sincerely hope that such fears are unjustified. On its face, the idea of evaluating existing fixed anchors that have not been subject to any comprehensive climbing management plan already to see if they do indeed constitute the minimum application of human installation in wilderness makes sense, but it does open the door for the loss of high quality, popular, and historically important climbing routes in globally significant climbing locations.

This is similar to the problem noted above with proposing temporary prohibitions on fixed hardware that could easily become de facto permanent bans, and therefore the draft guidance should be edited to specify 1) the strongest possible consideration of the recreation value and historical value of existing climbing routes in the MRA evaluation process, and 2) the absolute minimum instances of determination that existing fixed hardware is no longer appropriate to remain. After all, such anchors have been in place in established wilderness areas heretofore, and in nearly all cases their impact on wilderness character has been minimal.

If a Minimum Requirements Analysis (MRA) is going to be used to evaluate existing newly proposed fixed anchors and fixed equipment in Congressionally designated wilderness areas, such evaluations should include consideration of circumstances where allowing a fixed anchor on a route that is likely to see regular climbing traffic can help to minimize impacts on nearby vegetation, rocks, and other natural features in ways that help to preserve wilderness character. Indeed, sparingly placing bolt anchors in strategic locations can alleviate wear on the bark of trees that are used for rappelling, can reduce grooves or marks on soft rock from ropes or webbing, and can be less visually noticeable or detracting than large loops of nylon webbing or other material left at rappel stations. In fact, with the use of modern, refined techniques for preparing the surface of climbing bolts and hangers (such as painting them with durable, textured paints designed to match surrounding rock colors), climbing hardware can be so substantially camouflaged on a natural rock surface as to be very difficult to spot from the ground at all.

This is an important specific aspect of the considerations outlined for Step 2 in Appendix B. Specifically, the wilderness climbing policies established in Director's Order 41 section 7 notes that "the occasional placement of a fixed anchor... does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act" but also notes that "climbing practices with the least negative impact on wilderness resources will always be the preferred choice." In that context, approving a judiciously placed and well camouflaged fixed anchor can be the practice with the least negative impact. It can be a practice that, rather than violating the Wilderness Act or impairing the future enjoyment of wilderness, preserves wilderness character for future visitors.

Sincerely,

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