

Data Submitted (UTC 11): 1/30/2024 10:36:09 PM

First name: Kevin

Last name: Manley

Organization:

Title:

Comments: FSM 2355 Climbing Opportunities #ORMS-3524

To whom it may concern,

Firstly, I'd like to thank you for reviewing the many comments you are bound to have received. Feedback is essential in any management activity, and I appreciate the long tradition of enabling and enhancing access that the USFS has provided to this wonderful public resource. I very much appreciate your efforts to maintain the wilderness and wilderness experiences for all.

I am an avid climber of rock and ice (sport, trad, and bouldering), an active canyoneer, and primarily a caver. I've been working with your agency for decades, donating hundreds of documented hours per year, as an elected representative of our local caving group through the Colorado Cave Survey, as a guide for biologists in the White River National Forest, mapping caves for many of the forests in Colorado, New Mexico, Wyoming, Montana, and South Dakota, inventorying cave features, collecting samples for scientists that have permits, and installing hardware necessary for the maintenance, preservation, and restoration of caves. My girlfriend and I also maintain trails in CO and New Mexico (primarily in San Pedro Parks). As you might infer, I am very committed to the mission of maintaining these lands.

While I appreciate the good intentions behind this directive to prepare climbing management plans, I see many problems with it.

Firstly, it is unclear if this document is intended to apply to caves and caving. Please consider specifying that caves are excluded from this directive. Cave management plans typically include procedures for the placement of bolts and other fixed gear in caves. Not excluding caves in this document would present cave managers (who should be the ones making decisions about the caves they manage) with conflicting requirements for management. In caves, natural anchors are not always an option. Rigging on natural anchors often harms the cave more than a single anchor would by damaging formations and causing wear from ropes on delicate surfaces. With a well-placed anchor, movement through the cave can be directed to a single low impact route, avoiding mud and broken formations and enhancing safety. Well placed anchors are safer than natural anchors, and if an accident were to occur, some damage to the cave is nearly guaranteed. Without anchors and caver volunteers, the USFS simply does not have the resources for monitoring caves. Likewise, science (climate study, archeology, paleontology, biology, and physics) would also be impossible. See for example the work done in Natural Trap in South Dakota or the paleontology work done in New Mexico in the Lincoln National Forest. The stated missions of the USFS (exploration, education, restoration, research, and recreation) in conjunction with the National Speleological Society will all be harmed unless caving is specifically excluded from this directive. Fixed anchors must be allowed for safety and resource protection.

On to climbing...The Wilderness Protection Act prohibits many things but specifically does not prohibit fixed anchors. I believe that this is intentional; it allows the placement of a vital bit of safety for the enjoyment of wilderness in a way that has been part of our national tradition for a century, at least. The USFS has allowed and even promoted climbing for decades. Many people are inspired by climbing (see the growth of the sport, the addition of climbing to the Olympics, several movies and TV shows, the celebrity of many world class climbers that live in the United States). The Boy and Girl Scouts of American having climbing merit badges. Many people use climbing as therapy: consider groups like Wounded Warrior and the Adaptive Climbing Coalition. Climbers and canyoneers don't typically place anchors that are not needed as they appreciate the wilderness experience and due to cost. Ice climbers need the anchors that have been placed as the ice at the top of many climbs

sometimes does not form or isn't of sufficient strength to make an anchor. Many of the anchors in the forest are maintained by volunteers with expertise and time, freely given, that the USFS simply does not have the trained personnel or bandwidth to devote to this action. Not allowing fixed anchors to remain in the forest will hinder the work of scientists working with bats and the partnership the USFS has with Climbers for Bat Conservation as well as many others. Anchors also protect the landscape; if there are no anchors, those that climb will use trees and other natural features that are more easily damaged and potentially less safe, leading to resource degradation.

In both cases, I'd also suggest explicitly excluding temporary bolts and anchors. These can be placed, used, and then removed, leaving only a small hole in the rock. They are clearly not "installations" that would have to be maintained.

I have many friends that work for the USFS, NPS, and BLM as cave managers, park managers, rangers, interpreters, law enforcement, and technicians. All oppose this directive in its current form. If caves can be specifically excluded, and if the policy can be brought more in line with the tradition of climbing partnership between the USFS and the climbing community, we would support it.

Thank you for your consideration,

Kevin Manley
National Speleological Society Member #61708RLF
Avid caver, climber, backpacker, and volunteer