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Comments: To the U.S. Forest Service,

I am contacting you to provide comments on the newly proposed directives for climbing management on National Forest System lands under FSM Section 2355. I implore you to reconsider some of these guidelines, as I believe they will prove to be harmful for climbing recreation. As an avid climber since childhood, I have spent much of my life climbing in areas such as Rumney Rocks, New Hampshire, where local climbers and White Mountain National Forest rangers have worked together for decades to promote safe and environmentally responsible climbing. While Rumney Rocks (Rumney) is designated as outside of wilderness land, I believe Rumney's climbing management plan is exemplary for its collaboration between rangers and local climbing communities. This plan takes a nuanced approach to issues such as the placement, replacement, and maintenance of fixed anchors (bolts) and has ensured climber safety while minimizing the resource impact of climbing.

However, safe climbing access in both wilderness and non-wilderness locations is now being threatened by some of the Section 2355 guidelines, which do not take into account these nuances. For instance, section 2355.21, Item 12, proposes that climbing management plans should prohibit fixed anchors in wilderness areas unless authorized on a case by case basis. This item, and other similar items restricting the use of fixed anchor bolts in the wilderness (such as 2355.32 Items 5 and 6), seek to eliminate bolts due to a mistaken understanding of the usage and resource impact of bolts. Installing an anchor bolt is very different from the process of constructing a trail or other permanent structures - bolts are very small metallic rings placed into the rock to facilitate safe ascent or descent. Bolts have essentially no impact on the wilderness land, as they do not disturb soil, trees, or other resources. Moreover, they are an essential safety feature in virtually every wilderness climbing area. Responsible climbing management plans such as the Rumney Rocks CMP recognize the importance of timely maintenance and replacement of bolts by local climbers as a critical part of safe climbing. These approaches correctly place the responsibility for maintaining a safe climbing environment in the hands of the local climbing community rather than in the hands of inefficient bureaucratic processes. Subjecting every placement or replacement of a bolt to a lengthy review for special authorization will endanger climbers in the meantime when old equipment inevitably needs to be updated. The same can be said for the guidelines which will require a review to approve the continued existence of previously established anchors. I urge you to adopt policies that empower responsible climbers to take charge of their own safety in these challenging and unpredictable wilderness environments.

I am also deeply concerned about some of the guidelines for non-wilderness areas in section 2355.31. While I commend the USFS for recognizing the importance of honoring existing climbing management plans, some items are not compatible with safe climbing and authentic adventure (for instance, section 2355.31 Item 3). The requirement that fixed anchor bolts must be restricted to "approved new climbing opportunities" will all but eliminate the possibility of new climbing adventure in these areas and will have a negative impact on safety and local resources. For instance, descent from cliff faces via bolt anchors is very safe and has a minimal impact on resources. The only alternatives for descent are usually hiking descents or rappelling from trees, both of which are more dangerous and can damage vegetation along cliff tops. The requirement to limit fixed anchor placement to "approved new climbing opportunities" in section 2355.31 Item 3 is a problem because the term "approved new climbing opportunities" is not well defined and therefore will be difficult to reconcile with the specifics of climbing management plans. Furthermore, I believe it will destroy the potential for true adventure climbing that our sport values so dearly by subjecting any new climbing to an arbitrary and ill-defined approval process, which could take months or years. The Section 2355.31 Item 3 restriction on fixed anchors threatens to take away any chance of safe climbing exploration in non-wilderness areas and must be revised.

Many climbers, myself included, feel that some of the Section 2355 guidelines amount to a "bolt prohibition" which threatens to destroy the very existence of rock climbing in our country. The sections in particular that must be changed are 2355.31 Item 3, 2355.32 Items 5 and 6, 2355.3 Item 4, and 2355.21 Item 12. I ask the USFS to recognize the importance that fixed climbing anchors hold both inside and outside of designated wilderness lands, and to respect their usage.

Sincerely,  
John Meagher