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Comments: I support the direction to encourage the Forest Service(FS) to prepare climbing management plans. Resources are often limited, and this has not been made a priority in the past. However, restricting the installation and maintenance of Fixed Anchors and Fixed Equipment due to a lack of FS resources to complete planning documents is not acceptable.

This directive addresses climbing opportunities on National Forest System (NFS) lands, but the sections on Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment could also be applied to caves that are not managed as climbing opportunities. If it was meant for these procedures to exclude caves and be specific to climbing opportunities only, please add a clear statement excluding caves from the Fixed Anchors and Fixed Equipment procedures.

2355.01 If this directive will also include caves, under Authority, please add the Federal Cave Resource Protection Act of 1988 (FCRPA)(16 U.S.C. § 4301 et seq.)

2355.02 In addition to providing climbing opportunities, this manual provides direction on Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment. Consider adding an objective covering that, such as: Ensure that fixed anchors and fixed equipment are placed or replaced to reduce adverse resource impacts or to address safety concerns.

2355.03 5. Also clearly allow for the replacement or maintenance of existing fixed anchors and fixed equipment until a MRA can be completed. The FS should not prohibit replacement of unsafe equipment due to a lack of FS funding and resources to complete paperwork.

6.b I appreciate that it is recognized that "the placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act"

9. I do not think that the FS has the resources to issue and administer additional special use permits for recreation purposes, allowing non-permitted access for climbing opportunities should be encouraged in climbing management plans.

13. should not be limited to collaborations with climbing organizations.

2355.05. Caving is not included in the examples of climbing. To preclude confusion that it falls under the "not limited to," it would be helpful to add a statement somewhere that caving type uses of Fixed Anchors and Fixed Equipment will be covered by cave management plans and not climbing management plans.

2355.31 3. I am concerned about the abundance of the word restrict in this section. Especially if this is section is to be used for caves as well as climbing opportunities, fixed anchors and fixed equipment must be allowed to enhance safety and resource protection. Making a climb easier in a cave enhances safety and resource protection and should be encouraged not restricted. When caving we follow the order of importance as #1=your safety (because if an accident happens it will negatively affect the following goals), #2=protect the resource, #3=the project goal. Caves are often accessed to appreciate the resource, not just to enjoy the most difficult physicality as this section is seeming to describe. If these procedures must also be followed for caves, please add cave specific considerations.

It might be useful to add a section or statement that encourages for the reassessment of restrictions as new technology or techniques are developed. Sometimes agency personnel might not want to approve new things that they are not familiar with, or never allow access to an area once it has been denied, even though lower impact techniques have been developed.

Recreation opportunities at low development scales are managed with an emphasis on resource protection and... no management of activities or site conditions. Manage climbing opportunities to the minimum extent needed to accomplish management objectives.

The placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act. Therefore, prohibitions should not be placed on installing and maintaining fixed anchors and equipment that enhance safety and resource protection and do not impact the wilderness character.