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Organization:

Title:

Comments: I am a 63-year-old retired engineer, who found their love of climbing through her, two sons, and their love of Climbing. Who knew on the day my sons took me out to show me what climbing and canyoneering are about, that I would become such an enthusiast of climbing. I never thought I would find such an engaging passion at the age of 58. Climbing provides for me an opportunity to get out in the forest and see the beauty of the cliffsides that overlook our public lands. Climbing to me is more than just an adventure. It provides an opportunity to learn more about the geology and Flora and fauna beyond what I can find out my back door. I grew up in Colorado and respect the preservation and conservation of wilderness. I also respect the ability to safely recreate within our public lands in a respectful way.

I understand the reasoning behind trying to propose a policy for managing Climbing in our national parks and forest lands, including wilderness areas. Climbing has increased in popularity over the last decade, with an explosion in the number of Climbers in the outdoors, since a major shut down during Covid and the advent of climbing in the Olympics and X-Games events. With such growth, there has been an incredible increase in the number of climbers taking to the trails in forests and parks.

The USFS and NPS Climbing Management plans have now proposed as "prohibited installations." Additional outdoor recreational activities, whose safety will be impacted significantly, also need to be considered. Climbers are not the only group recreating on our public lands. There are Canyoneers, mountain bikers, hunters, anglers, rafters, kayakers, cavers and so on. And to the extent of various outdoor activities using "anchors," climbing is not the sole sport. I look to mountaineering, canyoneering and caving as additional activities requiring such safety mechanisms as Bolts and Anchors.

I became involved with climbing organizations to give back to the community. I found that the organizations work hard on the stewardship of those areas around them. Climbers organize and participate in NF and NPS road and trail cleanup, promote human waste management by providing wag bags or port-a-potties as part of the Leave No Trace efforts, work side-by-side with National Forest and National Park personnel to coordinate erosion control events, manage local rebolting efforts to replace faulty or failing hardware, and hold open discussions on local climbing and bolting ethics.

There have been many recommendations talked about surrounding the proposed plan. Several climber have recommended that "grandfathering" existing hardware and allowing for the replacement of unsafe bolts/anchors without having to wait on a lengthy MRA process would go a long way to extending an olive branch to the communities. This would continue to promote safety for climbers, canyoneers, cavers, and mountaineers. Without an increase in funding and staffing for the MRA process and a blanket listing every single bolt, stuck trad gear, sling or webbing, the safety in climbing will decrease significantly. Accidents will increase, thereby requiring more efforts from SAR organizations, which are also underfunded.

We have also included the broader picture of any socioeconomic impacts that would affect smaller, local towns and businesses surrounding NPS and USFS lands that promote climbing. Ten Sleep, Wyoming comes to mind immediately. Without the advent of climbing growth, that town would not be flourishing as it is today. New campgrounds have established. The town touts a local brewery, started and managed with the help of climbers. I could site numerous examples, but that is one location where I've personally watched the positive changes for the small town.

I urge that USFS and NPS bring climbing (and canyoneering) organizations to the table to discuss a more appropriate and implementable management plan. Climbers are highly motivated to protect their outdoor

recreating on our public lands. Working together on a solution would go a long way in improving the interaction of government agencies and the public, thereby putting together an implementable plan that climbers, canyoneers, cavers can support

Here is a concise list of guidance the USFS needs to take into consideration with respect to FSM 2335 Climbing Management Policy.

1. The FSM 2335 climbing management policy will result in a prohibition on climbing development, fixed anchor maintenance, and new fixed anchor placement that if adopted, will most likely result in climber injuries or even deaths.
2. The FSM 2335 reliance on the development of Climbing Management Plans before actions can be taken by climbers is unworkable.
3. Climbing Management Plan development should be consistent with recreational goals, standards, and desired future conditions provided in a Land Management Plan.
4. Climbing Management Plan guidance should include Forest Service procedures for securing funding and resources in support of climbing management objectives through agency budgeting and congressional appropriations.
5. When establishing ANY National Forest Land Management Plan, FSM 2335 revisions should also reflect a policy direction of allowing maintenance of fixed anchors to be performed by climbers.
6. Language for conducting law enforcement patrols at climbing opportunities be removed from FSM 2355 and would be a waste of precious Forest Service resources.
7. The policy direction for Wilderness Areas in FSM 2355 be revised to generally allow for historically present fixed anchors to remain and to be maintained.