Data Submitted (UTC 11): 1/31/2024 3:32:53 AM
First name: Daniel
Last name: Carter
Organization:
Title:
Comments: Thank for the opportunity to comment on the Proposed FSM 2355 Climbing Directives. As a passionate climber, this subject is very important to me. I have greatly enjoyed climbing in Wilderness areas managed by the USFS, such as the Sandia and Latir Peaks Wilderness areas in New Mexico. There are many more climbing adventures I want to pursue in Wilderness areas across the US.

I appreciate and applaud the USFS for recognizing rock climbing as an appropriate activity on public lands, including those with a Wilderness designation (proposed FSM 2355.03, para. 1). The climbing experience can be improved and available to more people, with less impacts with an active partnership between the USFS and climbing community. Regarding proposed FSM 2355.21, a partnership between the rock climbing community, users, and USFS can lead to a better outcome for all. Any climbing management plan or special use permitting system should have thorough outreach to the climbing community and provide space for all to have an active voice in the direction of rock climbing on the local FS unit.

Re: "fixed anchors and fixed equipment are installations for purposes of section 4(c) of the Wilderness Act (16 U.S.C. 1133(c)) (proposed FSM 2355.32, para. 1)"
I do not agree with the above proposal. The context of "installations" in the Wilderness Act of 1964 is clearly in reference to more substantial structures such as buildings and roads, as it states "no structures or installations" in the same sentence as roads, motor vehicles/equipment. Bolts and slings are no more permanent than trail signposts, fences, and ranching infrastructure. Bolts should continued to be allowed as long as they are placed with a hand drill and sparingly per "traditional" climbing ethics. This approach has been accepted among the climbing community for decades, even prior to Wilderness. The climbing community does a good job of respecting this type of climbing and climbing development and preserving this type of climbing experience to wild places such as Wilderness. I do not think excessive bolting or development of "sport" routes that completely rely on bolts for protection is appropriate in Wilderness areas. The accepted ethics within the climbing community and very remote, harsh nature of Wilderness areas also protects them from being over bolted.

Further, the Minimum Requirement Analysis or other required authorization for placement of bolts will detract from the adventurous nature of developing and climbing routes in remote places such as Wilderness. I am very familiar with the current USFS staff capacity to manage and enforce such actions. The MRA will most likely be burdensome and confusing for both agency staff and climbers. Each field unit has unique climbing opportunities, use, and impacts and should be addressed on a case by case basis. Again, engagement with the climbing community should be a priority to address future management of climbing on public lands and Wilderness.

I look forward to enjoying many more climbs on our public lands and engaging with you on future developments. Thank you for your public service and providing this forum for comments.