

Data Submitted (UTC 11): 1/31/2024 3:28:15 AM

First name: Mitchell

Last name: Montgomery

Organization:

Title:

Comments: I Mitchell Montgomery, strongly oppose the details contained in proposed FSM 2355.32, para. 1 through para 6. As well as portions of proposed FSM 2355.03, para. 4.

The requirement of all wilderness and US Forest service areas to draft and enforce a Climbing Management Plan is an unreasonable and irresponsible draw of resources (time, man hours, and dollars) when the forest service plan already notes that climbing is an acceptable use of wilderness lands and on US Forest Service land. The current regulations and powers are sufficient to manage climbing, without potentially opening the USFS to liability in enacting and enforcing a legally complex and resource intensive plan.

Climbing in USFS land predates the Wilderness Act and was specifically mentioned to be an acceptable and compatible activity within them. The MRA Assessment process will potentially jeopardize the safety of climbers utilizing previously accepted bolts (which should not be considered installations), that up until this proposal have been wholly managed by climbers, with little to no issue. In fact climbers have spearheaded the movement to replace and ensure the safety of such anchors, which are by definition required to climb (an already accepted activity).

Each MRA decision document could potentially open up the agency to litigation, and the MRA process creates a needless bureaucratic barrier for managing sustainable climbing. Worse yet, there is no proposed timeline to enact the proposed MRAs, creating a potential open ended delay that may be used to deter climbing.

Lastly, the historical and cherished routes in wilderness areas that predate the Wilderness act will be subject. Many of those routes have historical significance, and in places like Yosemite are actively used as advertisement in media to draw tourists to visit or celebrate the parks uniqueness.

It's ironic that a billboard driving through NC on I-40, features a full photo of climbing in Linville Gorge (a wilderness area), on a climb that could not exist without bolts.

Additionally outside of wilderness areas, fixed anchors will be restricted to locales in this draft as "Climbing opportunity" is poorly defined such as "A user-created or primarily user-created dispersed recreation area on NFS lands with no, minimal, or limited Forest Service investment or amenities where climbing may be performed." This is vague and unenforceable without significant investment of resources to ascertain the required information for millions of acres.

We climbers, are a large voting bloc with significant resources, and a strong passion for preserving wilderness. We also are paying keen attention to those suggesting poorly researched plans.