

Data Submitted (UTC 11): 1/31/2024 4:33:44 AM

First name: Dolgio

Last name: Nergui

Organization: Ouray Climbers Alliance

Title: Chair

Comments: Recreation, Heritage, and Volunteer Resources

US Forest Service

Washington, DC

January 30, 2024

Re: FSM 2355 Climbing Opportunities Draft

Dear Recreation, Heritage, and Volunteer Resources Team:

Thank you for considering the following feedback from Ouray Climbers Alliance regarding adding a new section (2355 - Climbing Opportunities) to Forest Service Manual (FSM) 2300 - Recreation, Wilderness, and Related Resource Management, Chapter 2350 - Trail, River, and Similar Recreation Opportunities. We genuinely appreciate the effort your team has dedicated into drafting a chapter for the Forest Service Manual dedicated to climbing.

Ouray Climbers Alliance is a local climbing advocacy group representing the climbing community of a small county in Southwest Colorado. Approximately 40% of the land mass in our county is on National Forest lands and our community is passionate about outdoor recreation including climbing. Ouray County is home to two 14,000 peaks and two designated Wilderness areas. We are proud of the rich climbing history of the area with the first documented ascent of Mount Sneffels by the Hayden Survey in 1874. Visitors and residents of Ouray County enjoy an extensive variety of dispersed recreational opportunities within Ouray Ranger District of the Grand Mesa, Uncompahgre, and Gunnison Forest including mountaineering, peak bagging, rock climbing, ice climbing, bouldering, canyoning, ski mountaineering, and paddling that all rely on fixed climbing anchors for safety. We therefore would like to offer the following comments regarding your draft proposal - the first part of the comments concerns the overarching policy points and the second part deals with small corrections in the text of the document.

Overarching Policy Comments.

1. We appreciate that the FSM recognizes climbing as "an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character of many NFS wilderness areas."
2. We support empowering Forest Service staff from Regional Foresters to Forest Supervisors and District Rangers to work with local climbing organizations to develop effective working relationships from executing and administering cooperative agreements, to collaborating to develop climbing management plans and down to maintaining and replacing fixed anchors. We strongly believe, however, that these mandates should be backed by congressional funding to hire staff educated in climbing to work on developing climbing management plans and also to work on implementing them.
3. Climbing Management Plans should be backed with sufficient funding. In the absence of funding, and absence of climbing management plans, the National Forests or the Ranger Districts should default to the status quo.
4. We support the policy that the climbing anchors should be replaced by climbers in a safe and efficient manner.
5. There should be no existing anchor removal unless there is a conflict with natural and cultural resources.
6. We urge you to grandfather in existing anchors even in wilderness areas - as we have mentioned above, there is a rich history of climbing in our area dating back to the 19th century.
7. We support minimizing impacts from climbing to the natural and cultural resources, and promoting stewardship opportunities and collaboration between the Forest Service and climbing organizations.
8. Please make sure to reserve the "in the moment" safety decisions to place new fixed gear.
9. Please understand that in the majority of modern climbing, fixed anchors are used for safety during ascent and descent, and not to aid climbing itself.

Specific Corrections.

1. Section 2355.04a (4) - giving the "manufacturers of recreational equipment" an equal footing with local and climbing organizations to develop climbing policy, could lead to unintended consequences of climbing policies being driven by commercial interests. Please consider striking "manufacturers of recreational equipment" from

this sentence.

2. Section 2355.04e (3) - please replace "increase" with "support" or "enhance" to read "When consistent with applicable law and directives, the applicable land management plan, and the applicable climbing management plan, issuing and administering recreation special use permits to support(enhance) visitor climbing opportunities and enhance visitor education and awareness of low-impact climbing practices."

3. Section 2355.05 - "Fixed Anchor" definition needs to be expanded beyond bolts and pitons to be consistent across all federal agencies. Please adopt the National Park Service's definition of a fixed anchor as "any piece of climbing equipment that is left in place to facilitate a safe ascent or rappel. Examples include, but are not limited to, bolts, pitons, and slings."

4. Section 2355.1 - please strike "at climbing opportunities" from the last paragraph to read: "Climbing opportunities on NFS lands have inherent potential risks due to features or qualities of the land or environment, such as uneven or otherwise dangerous terrain; the risk of falling; risks associated with poor placement and lack of maintenance of fixed anchors and fixed equipment; risks associated with insufficient training, experience, or equipment; exposure to and effects of weather and wildfire; and the presence of insects, reptiles or wild animals, poisonous plants, hazard trees, flood plains, rock fall, landslides, and other aspects of the natural world. Individuals engaging in climbing at climbing opportunities on NFS lands assume these inherent risks."

5. Section 2355.21 - please strike "for climbing opportunities" to read: "As funding and resources allow, prepare a climbing management plan for climbing opportunities in Congressionally designated wilderness, and for climbing opportunities outside wilderness where the District Ranger determines that climbing is causing adverse resource impacts or use conflicts, and post the climbing management plan on the website of the applicable administrative unit."

6. Section 2355.31(3). Please remove this section. The #2 of this section already adequately covers that "The placement and replacement of fixed anchors and fixed equipment must be consistent with any applicable climbing management plan, including requirements to reduce adverse resource impacts." #3 of this section is misguided since climbing anchors are used to facilitate safety of ascents and descents, and are not used "to make climbs easier".

7. Section 2355.32(1). Chipping hand holds and foot holds into the rock is not an acceptable climbing practice, especially in a wilderness setting. Please remove the following from the last sentence: "; and approving fixed anchors and fixed equipment in areas where impacts on the rock face are occurring due to the use of rock hammers to chip hand holds or foot holds into the rock."

8. Section 2355.37. Please replace "increase" with "support" or "enhance" (please see our bullet point #2 above).

We thank you again for the opportunity to comment and we look forward to collaborating with the GMUG planning team and the Ouray Ranger District on protecting climbing in Ouray County.

Best regards,

Dolgio Nergui (she/her)

Chair of the Board