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Organization:

Title:

Comments: Thank you for providing me with the opportunity to provide comments on the proposed USDA Forest Service proposed directive FSM 2355 Climbing Opportunities #ORMS-3524.

I began climbing in the Red River Gorge over 20 years ago. This includes having climbed in the Clifty Wilderness Area. Among others, Funk Rock City has always been one of my favorite crags anywhere in the world. The proposal concerns me that the future of many of the great climbs at this crag, such as Manic Impression, Funkadelic, and Orange Juice, is at risk. Climbing anchors must be maintained, replaced, and updated over time in order to keep a reasonable amount of safety. New climbs can be established in ways that conform to the idea of wilderness.

I am a member of the Red River Gorge Climbers' Coalition and the (insert Access Fund. I support the position of the Red River Gorge Climbers' Coalition (RRGCC) in their comments requesting for the proposed directive FSM 2355 to be withdrawn and revised to address the RRGCC's concerns that:

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. As established by the Daniel Boone 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 already limited 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.

Thank you,  
Julie Vargo