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Comments: I am a climber and NEPA practitioner, and I think climbing management policy is important to protect recreational, cultural, and environmental resources on NFS lands (inside and outside of wilderness). Specifically, I support the development of climbing management plans because they foster collaboration between Forest Service units and local climbing communities. That being said, I think that some of the wording in the proposed FSM sections unnecessarily restricts local decision-making and could be revised to allow for more flexibility, especially for wilderness climbing management.

The questions/comments below apply to FSM 2355.32:

*General: The text in FSM 2355.32 can be significantly pared down for clarity and flexibility (see revised text below which incorporates additional edits).

*General: Why are minimum requirements analyses (MRAs) specifically called for in this section and not in other chapters/sections of the FSM which guide wilderness/recreation management (e.g., FSM 2320, FSM 2350)?

*General: Include provisions for programmatic MRAs for anchor placement/replacement at the appropriate scale - whole crag, climbing area, or unit.

*General: Include provisions for exceptions based on locally developed climbing management plans.

*2355.32(1): Define "case-specific" - does this mean for each crag, route, or piece of equipment?

*2355.32(2): For clarity, use this subsection only for "placement" of fixed anchors/equipment, and move all discussion about "replacement" to subsection 2355.32(5). These are two different issues requiring different management.

*2355.32(2) and 2355.32(3): combine to reduce repetition.

*2355.32(5): Move the discussion about updated MRAs due to changing wilderness conditions to its own subsection. This can be expanded upon for both placement and replacement of fixed anchors/equipment.

Revised text for proposed FSM 2355.32:

1. Climbing, including the use of fixed anchors and fixed equipment, can fulfill important wilderness recreational purposes and can help preserve wilderness character by providing opportunities for primitive or unconfined recreation.
2. Fixed anchors and fixed equipment are installations for purposes of section 4(c) of the Wilderness Act (16 U.S.C. 1133(c)).
3. A Forest Supervisor may authorize the placement of new fixed anchors and fixed equipment in wilderness based on a case-specific determination that the fixed anchors or fixed equipment is the minimum necessary for administration of the area for Wilderness Act purposes.
4. Determine whether placement of fixed anchors and fixed equipment in wilderness is the minimum necessary for administration of the area for Wilderness Act purposes by conducting a Minimum Requirements Analysis. The determination must include an analysis of whether placement of fixed anchors and fixed equipment is the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. Document the Minimum Requirements Analysis and the determination based on the analysis, including how and why the conclusions in the analysis were reached.
5. Placement of new fixed anchors and fixed equipment in wilderness is allowed without prior authorization supported by a Minimum Requirements Analysis to respond to an emergency involving public health or safety or other type of emergency such as a forest fire or other natural disaster (FSM 2355.03, para. 7). New fixed anchors and fixed equipment placed in wilderness in an emergency must be removed unless the Forest Supervisor determines that the fixed anchors and fixed equipment are consistent with the applicable climbing management plan and are determined to be the minimum necessary for administration of the area for Wilderness Act purposes, or that removal of the fixed anchors and fixed equipment presents an unacceptable risk of injury, death, or wilderness resource damage. Document the decision to retain the fixed anchors and fixed equipment

and the rationale for the decision.

6. Emergency replacements of individual fixed anchors posing a legitimate safety concern may occur unless prescribed otherwise through an approved climbing management plan or equivalent planning document.

7. An updated Minimum Requirements Analysis should be completed if wilderness character conditions have changed since the original analysis.

8. A Forest Supervisor may propose removal of existing fixed anchors and fixed equipment in wilderness if they are no longer the minimum necessary for administration of the area for Wilderness Act purposes.

9. Prohibit use of motorized rock drills and practices such as chipping and use of glue, epoxy, or other fixatives for hand holds and foot holds in climbing management plans for climbing opportunities in wilderness.