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Comments: As someone who deeply values the majesty of nature, I try to do my part to take care of America's public lands and wilderness areas. I spend a lot of time hiking and climbing in the mountains in Utah's National Forest areas, and these experiences continue to build my respect for the land. In reviewing the USFS's proposed directives relating to climbing management, I appreciate the importance of setting standards to ensure that future climbing development does not erase the natural and cultural resources in NFS areas. However, this effort needs to be balanced by a recognition of the historical value of the many existing climbing opportunities in both wilderness and non-wilderness areas; as well as an understanding that climbing is a sustainable means for many to connect with nature and foster an attitude of stewardship.

The proposed directive is written in a way that seems to imply that any existing climbing installations are by default illegal and subject to removal. The process to legitimize existing routes requires additional funding and energy from land managers. I'm concerned that in practice, this will mean that many land managers will take the course of lower effort and close climbing areas which have been thoughtfully established and maintained for decades. I strongly suggest the directive be revised to support rather than undercut the efforts of the climbing community to make these beautiful areas accessible in a unique way. Existing climbing opportunities could instead be considered legitimate unless substantial evidence can be gathered regarding any detrimental impacts or sustainability issues.

In addition to concerns about preserving the legacy of climbing, I am also concerned that the proposed steps required to maintain fixed anchors in wilderness areas will create unnecessary obstacles to keeping those routes safe. The language of the directive itself implies that the MRA will require additional funding and resources beyond what is currently available, so this process will not only be a burden to the climbing community but also to land managers. It would be wise to instead establish simple and standardized policies whereby the climbing community can continue the practice of maintaining fixed routes as it has been doing effectively for decades.

Paragraph 9 in FSM 2355.03 has what I believe is some worthwhile guidance. Judicious use of permits may be very effective in helping users understand better how to recreate in sustainable ways, and prevent excessive traffic in sensitive areas.