

Data Submitted (UTC 11): 1/31/2024 4:10:55 AM

First name: Zachary

Last name: Winters

Organization:

Title:

Comments: Climbing on public federal lands is a vitally important way in which Americans and visitors engage with our uniquely American wild spaces. As someone who is intimately familiar with climbing management at the Ranger District level, I have learned that the climbing user group consists of upstanding public land stewards, and well managed climbing resources across the country provide a healthy outlet for adventure, social wellness, physical fitness, economic vitality, and intimate connections with NFS lands. Further, climbing is a historically important form of primitive recreation which, in most of its forms, is appropriate in designated Wilderness and consistent with Wilderness ethic. Historically climbers were a small enough user group that minimal regulation and hands-on management was rarely problematic, however modern climbers by-and-large understand that fair and intelligent management is beneficial not only to the protection natural resources and Wilderness Character, but to the tradition of climbing itself.

For far too long, local USFS units have been tasked with managing climbing on their lands without sufficient national guidance nor fiscal support from the agency, so I applaud the Washington Office for prioritizing climbing management and issuing this guidance. Perfecting this guidance for an activity which is as nuanced as climbing and which encompasses such a diversity of landscapes as climbing areas across all NFS lands is an impossible task. However this FSM2355 Climbing Directive is far too imperfect to be implemented in its current form.

I ask that the following (5) problems with the Directive be considered:

(1) Fixed anchors should not be considered installations for the purpose of the section 4(c) of the Wilderness Act. Fixed anchors in wilderness should be rare and used with extreme restraint, however defining them as installations is fundamentally problematic because it revokes the users discretion to use a critical life-safety tool in the moment of need, restricting their opportunity for primitive and unconfined recreation, while also potentially increasing likelihood of accidents when a climber is forced to choose between complying with federal law versus protecting their physical safety. Climbers need education on the restraint required to stay consistent with Wilderness ethics, but also need to be trusted to make critical decisions to prevent costly, tragic, and resource damaging rescues in Wilderness; rescues which have proven to have significantly greater impacts on Wilderness Character.

(2) Minimum Requirements Analysis is the wrong tool for managing fixed anchors in wilderness. Completing Minimum Requirements Analysis for all appropriate fixed anchors in wilderness across NFS lands would be a monumental undertaking with very little feasibility. No comprehensive inventories of fixed anchors in NFS Wilderness exists. Staff time and funding falls far short of the task to complete the thousands of MRAs which would be required. Due to such low feasibility, we must consider the alternative outcome when such direction is issued but not completed. Likely, some units would issue fixed anchor moratoriums, while others would invest vast resources while still falling short of Wilderness management goals, creating a patchwork of compliance across Wilderness areas which should be managed to the highest standard. Both outcomes are a disservice to the Wilderness visitor and the Wilderness itself.

(3) Outside of Wilderness, restricting establishment of new routes to existing climbing opportunities creates a "closed unless open" standard which is inconsistent with how the agency manages other forms of dispersed recreation. This approach creates enormous enforcement challenges, but more importantly will drive climbing development underground, unraveling decades of hard fought trust between climbing developers and land managers. It is critical that climbing route developers can openly share their intentions with land managers without legal repercussions, so that the land manager has opportunity to steer decisions based on valid resource concerns. Instead a "closed unless open" approach, sensitive resource or cultural sites should be specifically

closed to climbing route development to narrow enforcement objectives, increase recreation opportunities, and best protect the resources of concern.

(4) The Directive indicates that Climbing Management Plans should be prepared by units with appropriate climbing resources. While this is an admirable goal and vitally important, such a mandate should include the funding and staffing necessary to complete Climbing Management Plans of the highest quality. Unfunded, there is risk that a unit will rush through a CMP, failing to build critical relationships with the user group and relevant stakeholders. Well funded USFS Climbing Ranger Programs are an inexpensive way to ensure resource concerns are well understood, stakeholders and users are well represented, and climbing resources are thoroughly inventoried, prior to implementation of a Climbing Management Plan.

(5) A focus on fixed anchors falls short to adequately manage all types of climbing. Some forms of climbing such as fixed-anchor intensive sport climbing can be reasonably managed by regulating fix anchors themselves. However using fixed anchor management as a proxy for climbing management is entirely ineffective for climbing forms such as bouldering, which can be impactful and should be intelligently managed, but does not use fixed anchors at all. To better manage all kinds of climbing, the focus should be shifted away from fixed anchors and towards more impactful issues such as human waste, vegetative impacts, social trail proliferation, erosion, threatened and endangered species, and climber safety.

I sincerely appreciate your attention to the issues outlined above, and thank you for your work on this important topic.