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Comments: Hi, thanks for your presentation at the Caves/Karst Teams call and the opportunity to send comments on the proposed climbing directive. I am the Cave and Karst Resource Coordinator for the Lincoln National Forest. I manage over 100 caves in our Forest, including many that require technical ropework to access.

The FSM 2355 Climbing Opportunities directive includes sections on fixed anchors and fixed equipment that may apply to their installation and replacement for any purpose on all USFS lands. Caving is not included in the examples of climbing and is of course caves are managed differently than climbing opportunities. To preclude confusion that caving falls under the "not limited to," it would be helpful to add a statement somewhere that caving type uses of Fixed Anchors and Fixed Equipment will be covered by cave management plans and not climbing management plans. We could also add a cave specific section on Fixed Anchors and Fixed Equipment to FSM2356 Cave Management with a cross reference note.

Section 2355.03.7 should clearly allow the replacement of existing fixed anchors and fixed equipment unless it is prohibited in a land management plan or climbing management plan. Requiring that it be authorized, could mean that the plan has to exist. Our Forest has some popular climbing areas, but we have not had the direction or resources to develop climbing management plans since the 1990's. The FS should not prohibit replacement of unsafe equipment due to a lack of FS funding and resources. This section should also allow the authorization in cave management plans (if fixed anchors and fixed equipment in caves is not cross referenced to FSM 2356).

2355.03.9 The FS does not have the resources to issue and administer additional special use permits for noncommercial recreation purposes. Recommending non-permitted access for climbing opportunities should be encouraged for climbing management plans. Manage use to the minimum extent needed to accomplish management objectives.

2355.31 3. This section will need to be modified if also used for caves. Fixed anchors and fixed equipment must be allowed to enhance safety and resource protection. Making a climb easier in a cave enhances safety and resource protection and should be encouraged and not prohibited.

Let me know if you have any questions on my comments.