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First name: Julie

Last name: Neilson

Organization:

Title:

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Dear USFS,

I would like to provide my feedback on the proposed directive, FSM 2355, for climbing management on National Forest System lands. I am a 65-year-old Research Professor and Environmental Scientist who has been climbing since I was 16 years old (1974). My research focuses on reclamation of disturbed lands impacted by anthropogenic activities and includes USFS lands in Arizona, thus I understand the importance of limiting overuse of our public lands. I treasure our National Forests and National Parks for backpacking, hiking, ski-touring, and climbing and appreciate the management practices that maintain their pristine condition. I have always considered these recreational activities to be non-invasive, low-impact activities that respect the quiet and pristine nature of our wilderness areas. Climbing, for me, is unique among these activities due to the intense focus and interaction with rock surfaces required to safely ascend steep cliffs. I feel it is uniquely low-impact. Like many wilderness activities, the popularity of the sport has increased, and I understand that in certain areas public use should be evaluated. However, I feel strongly that restricted use of fixed anchors is not a safe or logical management practice to limit the impact of climbing in Wilderness areas. I argue that this proposed strategy has numerous potential negative outcomes.

History has shown us that alternatives to the currently used fixed anchors are worse. In the 1970s, pitons were commonly used and there was a strong movement to eliminate their use due to the damage caused to the rock during their removal. In comparison, fixed anchors do little damage to the rock. Further, when painted to camouflage with the rock, they are hardly visible from the forest below the cliffs. In Virginia and Maine, where I climbed in the 1970s, trees were used as fixed anchors at the top of cliffs. Ropes girdled and damaged the trees and in heavily used areas like Acadia National Park, many trees at the top of the cliffs died back due to overuse as anchors. Fixed anchors placed at the top of Otter Cliffs (Acadia National Park) have allowed regrowth of trees above the climbing cliffs. People have climbed in the Wilderness Areas and National Forests for generations and fixed anchors are among the least destructive safety tools available to climbers.

I currently climb in the Coronado National Forest of southern Arizona. Climbers in this area have a strong respect for the wilderness and are active in many conservation activities. Along with many of my peers, I have volunteered with the Climbing Association of Southern Arizona (CASA) to repair trails for erosion control and to clean up litter along the highway. Local climbers take care to use fixed anchors that are painted to match the rock color. Removal of fixed anchors installed by experienced climbers could create a safety hazard for those who continue to climb at the popular crags. Removal may also encourage less experienced climbers to install more destructive or unsightly anchors. Take a look, for example, at chicken head rock formations with multiple old slings dangling down the rock face. In reading the FSM 2355 document, I do not clearly understand the primary concern that has motivated the proposed restriction of fixed anchors. If overuse of certain areas is a concern, then restricted use permits would be a better solution than removing anchors that will jeopardize the safety of climbers. I would argue that fires and noise caused by wildcat shooting in the Coronado National Forest are much more destructive than anything I have observed related to the climbing community. If bolt intensity is a problem, then guidelines could be developed to limit the density of climbing routes on a given rock face.

The proposed language of FSM 2355.21 - that fixed anchors and fixed equipment are installations for purposes of section 4c of the Wilderness Act - is too general and eliminates a broad swath of environmentally respectful climbing to presumably address infractions in specific overused climbing areas in the country. I contend that this regulation be more specifically written to address the impacts that are causing the problems that motivated the need for a new management plan. I don't think that removal of fixed anchors will remove the climbers. The permitting of fixed anchors pending completion of a Minimum Requirements Analysis is dependent on funding, as

explained in FSM 2355. While awaiting funding and review, certain areas could provide safety hazards for climbers who are not aware of the new regulations and are unaware that NGOs like CASA are no longer maintaining the safety of fixed anchors. Thank you for your efforts to protect overuse of Wilderness areas, but I hope that you will consider the feedback of climbers in the creation of this directive for climbing management.