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Organization:

Title:

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Dear USFS,

My name is Joe Neilson, and I am a 66-year-old retired high school teacher and a recreational rock climber from Tucson, Arizona. I want to address the proposed directive, FSM 2355, for climbing management on National Forest System lands. I started rock climbing when I was 14 years old in New England. Back then, bolts were practically non-existent, and we relied mainly on trees for our anchors. Within that first decade of my climbing experience, I saw how badly these trees fared due to the constant rubbing of ropes and webbing. In many areas, these trees died, and we had to use other trees for anchors.

One of the areas where I climbed in the early 70's was Otter Cliffs in Acadia National Park. By the beginning of the 80's, the trees near the cliffs had been seriously harmed and died. I stopped climbing there because it was no longer safe, and I was dismayed by the destruction of trees to which I myself had contributed. At some point in the following decades, the National Park Service wisely decided to put in permanent anchors at the top of the cliffs, and when I last visited the area in 2022, the trees had noticeably improved, and the restoration of that small bit of forest was successful.

I am concerned that FSM 2355 will remove many of the anchors that have been established over decades, and that climbers will once again resort to using trees and leaving webbing and slings on rock formations. These latter anchors not only hurt trees but are unsightly to hikers and other recreators in the National Forests. I am also concerned about the safety of climbers who may not be aware that the anchors they have relied on so many times in the past have been removed.

As I understand it, fixed anchors have not been considered prohibited installations under the 1964 Wilderness Act, and that federal agencies have allowed, managed and authorized them for more than 50 years. Therefore, it seems a bit draconian to all of a sudden prohibit any new anchors and remove all existing anchors in these areas.

Instead, I suggest that the National Forest and Park agencies work with local climbing communities (like CASA in Southern Arizona) to help assess, maintain and promote sustainable and equitable outdoor recreation. I have been involved in CASA for quite some time, and it has had an excellent working relationship with the Coronado National Forest Service for years, helping to maintain trails, providing erosion control work, and litter and graffiti cleanup. A great example of these collaborations can be seen at Windy Point midway up the Catalina Highway. Windy Point attracts visitors from all over the country and world with its stunning views and fun hiking and climbing. Most visitors are tourists, and unfortunately some of them litter, spray graffiti, carve their initials into some trees, and create erosion problems. CASA, in collaboration with the Forest Service, has done significant work to clean up Windy Point and make existing trails more erosion resistant. It is a win-win partnership for everyone.

I also would like to see clearer and more focused language about what the issues are in respect to climbing. If FSM 2355 is addressing overuse of areas by climbers or destruction of natural habitats, it would be helpful to know exactly which areas need to be considered. The idea that removing all fixed anchors and bolts is a solution for the whole country is overkill and unproductive to solving particular overuse problems that need to be fixed.

Thank you for considering my comments and concerns.

Joe Neilson

Tucson, AZ

