

Data Submitted (UTC 11): 12/16/2023 6:23:03 AM

First name: Erik

Last name: Bernhoft

Organization:

Title:

Comments: To Whom It May Concern,

I am a practicing canyoneer that explores slot canyons on USFS land across the West. I want to convey that I am appalled by the recent proposition of limiting/removal of installed equipment (i.e. bolted anchors) within areas that I visit. You need to understand that these are necessary for safe recreation and are only noticed by those that enter these unique and difficult to access environments. Without artificial anchors (i.e. installed climbing bolts) you will be 1) limiting recreational access and 2) interjecting unnecessary safety hazards for those who still wish to visit these technical areas in the absence of bolts.

I strongly urge you to not move forward with these proposals.

-Erik Bernhoft

I stand with the Washington Canyon Coalition in conveying the following to you:

What's in place now (land managers managing the land according to the unique needs) is working, and it's counter productive to place universal restrictions on land managers who manage such a huge diversity of lands

The proposed restrictive national-level guidance is uninformed, and will likely have negative impacts on wilderness in some areas

In some, but not all, cases, bolted anchors are paramount to achieving both the recreation and conservation objectives of the Wilderness Act. National guidance prohibiting fixed anchors fails to acknowledge regional differences and will inherently undermine one or both of those objectives.

Note: The Wilderness Act states: wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.

Note: The USFS Minimum Requirements Decision Guide lists as its policy objectives: Protect and perpetuate wilderness character and public values including, but not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences.

Canyoning, like climbing and caving, is a legitimate way to experience our public lands, and brings unique value to the community

Canyoneers are the true experts in low impact canyoning, and when land managers partner with the canyoning community, they can achieve outcomes that best serve the purposes of wilderness and non-wilderness public lands.

This is an unfunded mandate, and it is irresponsible for an agency to issue guidance without identifying the resources it would take to adhere to the guidance.

The language that describes "existing climbing opportunities" is vague and inactionable. It leaves forest supervisors ill-equipped to make reasonable decisions about fixed anchors in non-wilderness areas. This provision should be removed.