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First name: Sean

Last name: Timmons

Organization:

Title:

Comments: I oppose this change (adding Section 2355) for the following reasons:

- The additional restrictions this would create on fixed anchor placement & assessment will inhibit access to canyons & climbing areas that require fixed anchors to safely practice canyoneering & climbing. These same fixed anchors also facilitate rescue efforts when needed and help prevent rescue incidents due to the reliability and quality of the anchors.

- The climbing & canyoneering communities highly value these fixed anchors and we self-police the quality of the anchors. A quick read of any Facebook group devoted to these areas will yield plenty of examples of how the climbing & canyoneering community constantly evaluates fixed anchors and removes / replaces them proactively to avoid dangerous situations. This has the result of reducing reliance on public resources for rescue efforts and policing of anchors.

- In many cases, especially in the desert southwest, fixed anchors are placed to help avoid excessive degradation of natural resources. Rope grooves in canyons are a prime example. As canyoneering techniques have evolved significantly over the past 15 years, the canyoneering community strives to minimize rope grooves in sandstone and bolts are placed in locations that help minimize friction that creates rope grooves.

- The sheer volume of canyons & climbing areas that would need to be re-evaluated if Section 2355 is added would be unmanageable for the public sector. This is likely to result in greater access restrictions stemming from an inability to cope with the volume of assessments required.

Overall it is reasonable to expect Section 2355 to result in reduced access, increases in rescue situations, and greater conflict between land managers and recreational climbers/ canyoneers. For these reasons, I request that these policies be re-examined and NOT implemented as currently envisioned.