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Comments: I am writing to comment on FSM 2355 Climbing Opportunities #ORMS-3524. There are a number of serious issues with this management guidance that I would like to bring to your attention. I participate in the sport of canyoning in the Pacific Northwest in the summers and in Utah in the winter. Canyoning is a young sport but is growing rapidly and is widely practiced throughout the United States and particularly in the Southwest.

The first issue is that in this guidance, canyoning (canyoneering) and climbing are combined within the same management rules. On the surface, both of these sports use fixed anchors to establish routes, but that is where the similarities end. Rock climbing establishes anchors on vertical rock surfaces, many of which can be visible from below. Fixed anchors in technical canyons are entirely different from fixed anchors at sport crags. Canyoning involves descending streams and waterfalls (in most of the country) and canyons (in the southwest). Fixed anchors are necessary to be able to descend these areas safely. It's literally a matter of life or death. Anchors are placed carefully, only where necessary and are usually not visible. In the Pacific Northwest and most of the rest of the country, they are not linked with webbing and are totally unobtrusive. In the southwest, most anchors do have natural color webbing that blends into the rock but can only be seen if you are descending the canyon and are not visible to hikers or other park users.

There are a number of locations with dry canyons, such as Death Valley NP where bolts are prohibited, but there are many other anchoring options such as logs, trees or rocks that allow for safe canyon descents. There are also many locations, especially those with flowing water in most of the country, where fixed anchors are not optional for a safe descent. In many trade route canyons in the southwest, a properly placed bolt greatly reduces rope grooves through sandstone, which reduces human impacts on canyons. Canyoneers are very careful to replace and carry out old webbing along with other trash that washes down canyons or flies in from elsewhere. I have removed mylar balloons from very remote canyons in Death Valley.

The main problem with this new guidance is that all fixed anchors will be considered prohibited "installations" in wilderness and severely restricted in non-wilderness areas as well. New and replacement fixed anchors may only be allowed after a Minimum Requirements Analysis (MRA) for prohibited uses. This guidance also extends to existing fixed anchors in wilderness areas that also have to go through an MRA or can be removed at the land manager's whim. This is obviously a completely unacceptable and unfunded policy that would require that land managers become experts in canyoneering and climbing in order to assess whether a bolt is necessary, as well as find the time and money to conduct these MRAs, which they won't. The canyoning community has never burdened land managers with stewarding canyon routes. We are all able to assess an anchor for safety, fix or replace loose or broken anchors and remove any trash from canyons.

The only thing this guidance will achieve is a blanket prohibition for thousands of people to enjoy their public lands, which is what happened in the North Cascades National Park (NOCA) about ten years ago. NOCA instituted a bolt prohibition in both Wilderness and non-wilderness areas of the park for all canyons, which means that no one can safely descend canyons anywhere in the park. The purpose of the Wilderness Act is to balance preservation with accepted recreational activities, such as canyoneering, in Wilderness areas. This guidance badly fails that test.

The scenarios that this guidance would cause veer very quickly to the absurd. What happens if I am descending a canyon that has a loose or broken bolt that needs to be fixed and this is an issue of my personal safety? Do I have to report this to the land manager and get their approval? Is the land manager now going to be in charge of maintaining bolts in areas they can't even access? These rules are so arbitrary that if one fixed anchor is denied an entire canyon could be inaccessible. Furthermore, the fixed anchor definition includes anything left behind,

such as webbing and slings, traditional climbing protection, pitons, ice screws, etc. If this rigorous definition of fixed anchors is used most canyons in Wilderness could be inaccessible to canyoneering.

I'm not sure what prompted the need for this policy. If there are rock climbing routes that are being installed in inappropriate places, then managers should take action to restrict new routes being put into sensitive areas. If there is overcrowding at rock climbing areas, then it's possible to implement a permit system much like Zion NP does with canyoneering routes.

I urge you to exclude canyoning from this ill-advised policy and to instead work with the rock climbing and canyoning communities to figure out solutions to the actual problem, whatever that may be.

Thank you,
Ella Elman