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Comments: I have been a traditional and sport climber at roadside crags and in the high alpine across the western United States. I now spend most of my time canyoneering in sandstone slot canyons and exploring canyoning routes in deep waterfall gorges. My experiences through these vertical rope sports have created a lifelong passion for wilderness that has far exceeded and impacted my life beyond what I experienced simply backpacking through a landscape. I have participated in my technical rope sports globally in dozens of countries informing a perspective not just from the U.S.

No Bolt Wars - communities have dealt with this internally and some land managers have already removed existing safe fixed bolt anchors in their jurisdictions based on recently implemented, no-fixed-anchor policies, which have caused safety issues already. We have limited rock real estate. Please, let's not remove existing safe anchors.

The USFS proposal in FSM2300 specifically calls out "as funding and resources allow" to evaluate keeping or removing existing fixed anchors. How will the land managers manage these fixed anchors requests in their jurisdiction in a timely fashion? If a response to an MRA is not provided in a certain amount of time, then is authorization assumed? I have previously asked for permission to place bolts in local open space, following the formal policy and never received a response. It's been years now.

Preferred: Provide a self-reporting process over the Minimum Requirements Analysis (MRA) to capture the discussed GPS location, an anchor photo, detailed anchor type and materials, time of installation and written justification for why it was deemed best to place a fixed (bolt) anchor in that location. While the intention and purpose of the MRA is clear, the successful execution of this burdensome process is dubious. Land managers get progressively less funding, while recreational communities who use ropes in technical activities to enjoy their wilderness continue to grow.

These new proposals have already committed that these vertical rope sports are important and historically relevant activities in our wilderness areas. The fixed anchors for canyons are most often in locations the general masses will never see. Most occasional hikers who form the millions of front country users in our public lands never notice them even if they do walk below a sport route on the trail. However, for the people who put the effort into going to these remote places to participate in technical rope sports, which use fixed anchors, whether they are slings or bolts, these are critical to the safety or ability to participate in the activity.

Preferred: Rather than an MRA process, have land managers provide guidelines or training for making quality placements for the specific rock type and environment and also how to remove these and re-use or upsize the existing holes for sustainability. This is currently handled in communities through self-teaching, detailed online resources, rare paid classes and in the best cases, informal apprenticeship.

Fixed anchors in softer sandstone slot canyons prevent rope grooves on edges, but have been generally reserved for high traffic routes. Fixed anchors in ever-changing waterfall canyons provide safer lines of descent avoiding hazardous water features or sharp edges. It should be highlighted that in the particular case of canyoning, a fixed anchor may be placed in a location that seems unnecessary in minimal waterfall flow, but is critical for safety when the canyon is descended in a safe manner with the fixed anchor in higher flow. Most canyons utilize one inch webbing slings for anchors when available as bolt installations are costly, time-consuming and this heavier equipment must be carried into very hard to access locations by backpack. Extensive thought always goes into the purpose of the placement of fixed anchors for these reasons.

Land managers will be unable to properly assess MRA anchor requests for canyoneering or canyoning unless they are also experienced in all the nuances of these activities. Depending on the nature of the canyon, specifically for aquatic, waterfall canyons, it would be impossible to provide a detailed plan to gain permission in advance if there is no prior knowledge of the slot as these adventures require top-down progression with unknowns around the next corner. This applies to first descent explorations as well as the first time through in a season following the spring melt as high flow events often change these canyon environments.

I compare fixed anchors (bolts) and fixed equipment (slings around trees or rocks) as the vertical equivalent to the retaining walls and bridges built for horizontal travel on backcountry trails. All allow for wilderness movement, enhance and do not impact my appreciation of the environment allowing me to experience the wilderness in better ways. These installations are far from the cabins or remote runways referenced in the 1964 Wilderness Act.