Data Submitted (UTC 11): 1/26/2024 2:36:26 AM First name: Amy Last name: Janas Organization: Title: Comments: Submitted electronically via https://cara.fs2c.usda.gov/Public/CommentInput?project=ORMS-3524

28 January 2024

USDA Forest Service 201 14th St. SW Washington, DC 20250

Subject: Advocating for Canyoning Access and Preservation in Wilderness Areas

Dear Smokey and USDA Forest Service Staff:

I recently came across your proposed directive "FSM 2355 Climbing Opportunities #ORMS-3524" which provides guidance on climbing opportunities (including rock climbing, snow and ice climbing, mountaineering, canyoneering, and caving). I am writing to express my concerns regarding the statements indicating that climbing management plans and the retention of existing fixed anchors are contingent on the availability of funding and resources.

As a dedicated advocate for the sport of canyoneering, a passion I embraced in 2020. Exploring canyons in Southern California, Utah, and my home state of Washington has been an enriching journey, shaping my connection with nature and people in profound ways:

- Introducing my teenage children to the sport and seeing their awe and appreciation for wilderness, history, and geology.

- Assisting a group of six formerly incarcerated individuals (who served sentences ranging from six to 27 years) as they made their first rappels and rappelled next to the flowing water at San Antonio Falls (Canyon Adventures, https://canyonadventures.org/ and ARC, https://antirecidivism.org/).

- Observing mammals and amphibians ranging from frogs, salamanders, mountain goats, big horned sheep and more.

- Meeting and canyoning with a group of women in their early, mid, and late 60's.

- Pursuing the sport with my partner, Kevin. We intend to canyon into our 60's and beyond!

I am writing to express my concerns regarding the statements indicating that climbing management plans and the retention of existing fixed anchors are contingent on the availability of funding and resources.

While I appreciate the acknowledgment of financial constraints, the potential delay in replacing unsafe bolts due to funding limitations could compromise the safety of climbers and the integrity of climbing installations. The people who participate in these various climbing-related sports typically inspect and maintain bolts (anchors) as part of being in the sport. A standard safety practice and value is to inspect each bolt before use, and if a bolt is deemed concerning or unsafe, that person or group either replaces it or reports it to the broader community so that it can be replaced.

Ensuring climbing safety is paramount, and the possible freeze on addressing unsafe bolts during the plan development phase poses a significant concern and risk. I understand the need for comprehensive climbing management plans, but prioritizing the immediate correction of unsafe bolts should be a primary consideration.

I urge you to explore alternative solutions that allow for the timely maintenance of unsafe bolts while adhering to the proposed guidelines. This approach will ensure the continued safety of climbers (and snow and ice climbers, mountaineers, canyoneers, and cavers) and the preservation of our natural resources.

Thank you for your time and attention. I appreciate the commitment of the USDA Forest Service to balancing the need for climbing management plans with the urgency of addressing safety concerns.

Sincerely,

Amy

Contact information is included in the form submission.