Data Submitted (UTC 11): 1/30/2024 5:05:20 PM

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Title:

Comments: I am writing to comment on FSM 2355 Climbing Opportunities #ORMS-3524 to ask that the language defining fixed anchors (i.e. bolts) as prohibited installations and requiring a Minimum Requirement Assessment for anchors in wilderness be removed from the proposition. I am concerned that this proposition will have severely adverse impacts on a user group that I am a part of, Canyoneers.

The sport of Canyoneering has a strong community that highly values conservation, safety and accessibility. I highly value the natural wilderness experience that Canyoneeing provides. I am able to experience waterfalls, wildlife, and geological features from a perspective not otherwise available without the sport of Canyoneering. Bolts are an essential part of the practice of Canyoneering, due to their ability to allow safe and low impact descent of waterfalls and drops within the canyon environment. The canyon environment is complex and although removable anchors are sometimes available, often using removable anchors leads to more erosion due to needing to access trees in soiled areas as opposed to placing a fixed bolt into a rock within the watercourse. Additionally, fixed anchors allow for safer placement and control of rappels, reducing the risk of accidents and making the sport more accessible to recreationalists.

My primary concern is that, while not outright prohibiting all fixed anchors, the requirement for a Minimum Requirement Assessment effectively prohibits development and maintenance of fixed anchors (bolts) due to the lack of funding for performing such assessments. Bolts are an essential tool for the safe, low impact practice of Canyoneering and this directive would severely limit the use of National Forest land for the purpose of Canyoneering. I am strongly in favor of preserving wilderness in its most authentic state while ensuring accessibility for a wide range of users to experience and appreciate our amazing federal lands which is in accordance with the Wilderness Act objectives. However the mandate requiring a minimum requirement analysis for the installation and maintenance of fixed anchors must be removed from the proposition in order to allow continued use of public lands for all stakeholders including Canyoneers.

I am aware of the concerns that increased placement of fixed anchors will damage the natural wilderness experience within national forest land. However, given the wide diversity of land governed by USFS, local land managers can continue to make decisions about the use of specific land without requiring overarching analysis that lacks funding as is proposed in this directive. Local managers are better able to serve the needs of the variety of user groups recreating and using the public land while adhering to the goals of the Wilderness Act without this addition of restrictive guidance for fixed anchors.