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Comments: I have spent the past 10 years recreating on public lands, both wilderness and non-wilderness, as a canyoneer. To say that canyoning has had a huge impact on my life would be an understatement. I have been on too many canyoning trips to count, as a novice, trip leader, and most importantly to me, as an explorer. I have explored beautiful and remote parts of our public lands that few people have ever seen, some of them perhaps having been seen by humans for the first time. Without the allowance of fixed anchors, myself and countless others who have fallen in love with our beautiful canyons would not have the ability to explore these canyons without having a greater impact, without being able to descend them safely, or perhaps not being able to experience them at all.

Fixed anchors allow canyoneers, first and foremost, to descend canyons safely. Canyoning involves descending a watercourse via a rope fixed to an anchor, where the water itself often presents high risk. It is critical that the line of descent is in a safe place to minimize risk as much as possible. The placement of the descent line needs to avoid any serious water hazards, avoid sharp edges that can cut rope, and allow for a line of sight in the event that a technical rescue is necessary. Often this means that the location of the necessary anchor has limited options, and the only feasible location to place an anchor is on a rock surface. Just a few feet (or inches) to the left, right, up, or down, could mean the difference between a safe descent, and an incredibly risky one with grave consequences. Often times there are no natural anchor options at all, and if there are, they are in a location that makes the line of descent unsafe, and prevents a safe and efficient rescue in the event of an emergency.

Fixed anchors also greatly reduce the impact on a canyon environment. With careful thought and placement, canyoneers can avoid placing anchors around living trees, and avoid eroding fragile soil trying to access these "natural" anchors. The minimal impact that fixed anchors have, over time, immensely reduce the impact in a canyon environment.

There doesn't need to be a large number of fixed anchors to explore canyons safely. In fact, we try to keep that number to a minimum as much as possible. Canyoneers are very aware of the impact they have on the environment, and reducing that impact while still being able to enjoy the canyon is a major consideration. Often times the anchors that are left behind are only ever seen by canyoneers, are not easily visible to the general public, and sometimes, even canyoneers forget where they are located and have trouble finding them because their footprint is in fact so small.

I do truly believe that prohibiting fixed anchors and classifying them as "installations" would be a huge step backwards in regards to safety, ecological impact, and access for the canyoneers, as well as all participants of rope sports that recreate regularly on public lands. We have found great value in these beautiful, remote corners of our world, and it would be a great loss to have the ability to experience them greatly reduced.

Thank you.