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First name: Adolfo

Last name: Isassi

Organization:

Title:

Comments: I write this letter on behalf of the sport of Canyoneering.

I'm a canyoneering certified guide and instructor, Technical Director of Canyon Guides International and Chairman of the American Canyoneering Association.

In your document: "Proposed FSM 2355 Climbing Directives" you outline clear and valid concerns regarding the preservation of wilderness. The focal point of this concern seems to be in this line of the document:

"bolt-intensive face climbs is considered incompatible with wilderness preservation"

(*page 5 6b FSM 2355 National Forest Service)

Canyoneering is not bolt intensive.

The bolts that may be visible to the majority of wilderness visitors are at the entrance and exit of canyoneering routes. And although canyoneers are a visitation minority, the bolts inside the canyon are visible only to canyoneers. The bolts inside the canyons can be placed in such a discrete manner that it may take some time to locate them.

Canyoneering is more related to caving, than rock-climbing. Canyons, in a way, are caves with open roofs. They are isolated fragile environments that deserve protection.

It may be counterintuitive, but the most effective way to minimize impact on canyons is through discrete, minimal, bolt installations. First and second generation USA canyoneers have tried Leave No Trace inspired anchoring practices, but time has proven that these practices do not scale as popularity grows, they are not the safest option, and they still scar and alter the wilderness aspect of canyons when combined with frequent visitation.

Preserving wilderness involves managing visitation. Managing visitation involves identifying the methods of least wilderness impact. Closing access to wilderness is not the best answer to build awareness of it, and support for it.

Please keep canyoneering routes open. Leave canyoneering out of the current Minimum Requirements Analysis (MRA), and if you see fit, create a new one that does not harm canyoneering and allows installation of bolts that minimize impact and preserve the wilderness character of canyons. Seek the advice of organizations that are familiar with sustainable, low impact bolting practices like the Washington Canyon Coalition and Canyon Guides International, or sources like the online Bolting Bible Canyoneering section.

Sincerely,

Adolfo Isassi