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Comments: I completely agree with the view of the Coalition of American Canyoneers (I do not represent them):

Canyoneering, also known as canyoning in Europe, is a Worldwide activity that combines elements of hiking, swimming, climbing, rappelling, and sometimes packrafting, to descend slot canyons. The activity has grown tremendously over the last thirty years offering unique outdoor experiences to millions of participants around the World. While canyoning is more established in Europe, the technical canyons in the United States have proven to be World renowned attracting Worldwide visitation, while at the same time attracting hundreds of thousands of Americans to the activity who seek the stunning beauty and adventure unique to canyoneering. Most canyons are found on America's public lands with a high concentration on the vast Colorado plateau. New canyons are routinely being explored and opened all over the US for others to visit.

The Coalition of American Canyoneers was formed in 2011 to advocate for recreational canyoneering access in the US. Our members support preserving Access through Conservation, Education, and Safety (ACES). During the last decade, as canyoneering has grown, we've partnered with dozens of land managers under the Department of Interior and US Forest Service to create effective rule making for canyon access, to clean the direct and surrounding environment, remove graffiti, improve campsites, and establish and/or remove fixed anchors to improve safety and reduce environmental impact. These efforts have been exclusively funded by the organization's member donations and conducted by our member volunteers. We are the access voice of America's canyoneers.

In an effort to limit excessive installations of fixed anchors on rock faces in Wilderness Areas used for sport climbing, the National Park Service Director's Order # 41 (the "Order") and the proposed addition to Reference Manual 41 (Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness) ("Draft RM41") reverses almost 60 years of precedent by defining installations under the Wilderness Act of 1964 to include bolts and webbing, common anchor material used by climbers long before passage of the Wilderness Act in 1964. While climbing (and canyoneering) is understood to be compatible with Wilderness, the Order and Draft RM41 seem to be directed at high density climbing activities that have increased crowding in Wilderness areas impinging on the central tenants of the Act. Regardless of the need for such intervention as it relates to sport climbing, the impact of the Order when accompanied by the unduly burdensome authorization process outlined in Draft RM41 will have a profound and devastating impact on the sport of canyoneering considering the following:

Canyoneers have long been champions of Wilderness and the ideals in the 1964 Act. The National Park Service (NPS) risks losing support of canyoneers for new Congressional Wilderness designations. Furthermore, it's likely that Congress will be engaged to either redefine the 1964 Act or to remove certain areas from Wilderness designation. Litigation is almost certain when land managers close technical canyons under this reclassification leaving the courts to decide if the NPS acted properly under the Act. Rather than cause such conflicts, the NPS should instead use other management tools to uphold key values in the Act. For example, crowding is often controlled by land managers by using permit systems to manage the number of people in an area at a time.

Fixed anchors in technical canyons are entirely different from fixed anchors at sport crags. Anchors in slot canyons are not visible to non-canyoneering visitors. Canyoneers often use natural colored webbing on natural features in technical canyons for anchors like pinch points between boulders, webbing wrapped around rocks

cammed in cracks, or knot chocks in cracks. Old webbing is replaced and carried out. More recently, advanced anchor techniques have been developed to leave nothing behind in certain situations, called ghosting, but these techniques fail to work in many situations and require nuanced and advanced skills for safe use. All of these natural anchor techniques have limitations and it can be necessary to use bolts to provide an anchor where no natural features exist. The case by case MRA procedure outlined in Draft RM41 is simply not reasonable or practical in addressing canyoneering fixed anchors. For every canyon descent, canyoneers must inspect every anchor and anchors must often be replaced for safety reasons. Slot canyons are ever-changing under the constant grinding action of violent flash floods pushing water, mud, sand, boulders and logs through these places. It's this natural erosional process that formed these slot canyons. Bolts are not permanent installations. They can last decades in some cases, but can be damaged or ground off completely by flood action. Natural anchor opportunities that existed yesterday can be gone tomorrow for the same reason. There is simply no way to anticipate the condition of fixed anchors in a canyon prior to descending the canyon. Therefore, a case-by-case MRA analysis, as outlined in the Draft RM41 is simply not possible for placement or replacement of every fixed anchor in a canyon. Having the ability to install a fixed anchor can be a life-safety issue, especially when canyon exploration is underway and you don't know what is ahead, or anchor conditions have changed from the last flash flood, or water is flowing requiring anchors to be in very precise locations to prevent drowning on rope. Retreating back up technical canyons is not possible in most cases because ropes are pulled from the prior anchor for the next. Installing ropes over the entire course of a technical canyon often isn't possible due to the remote nature of many of these places and the need to carry all of the rope(s) and other gear in a backpack.

While Native Americans usually didn't descend technical slot canyons, their fixed anchors are found all over the landscape. There are logs in cracks to aid climbing routes, logs spanning gaps on ledges to bridge across, log ladders, stacks of rocks to aid climbs and moki steps ground into rock faces to aid climbs. Some of these routes go at 5.6 or 5.7. Signs of ancient visitation abound even on temples in Grand Canyon where no sign of habitation exists. Native Americans climbed all over the landscape along routes and for views from high places. It's hard to imagine that the fixed anchors of today are any less important than the fixed anchors established by Native Americans, and surely, a fundamental tenet of the 1964 Wilderness Act was to allow man to move through the landscape much as ancient man did before highways, cars, towers, and buildings: the actual fixed installations the Act intended to prevent.

While we fundamentally disagree with defining a bolt or webbing in a technical canyon as a fixed anchor under the Wilderness Act (and such definition wasn't used for the first 50 years of the Act), Draft RM41 attempts to provide a procedure for land managers to determine if a fixed anchor placement or replacement is compatible with wilderness values through a Minimum Requirements Analysis (MRA). Unfortunately, there is no additional funding accompanying this new mandate. Adequate funding required to effectively manage our Federal Lands is already woefully short. It's unreasonable to believe that adding a new unfunded mandate will result in timely analysis of each fixed anchor already installed in Wilderness, or new fixed anchors that need to be installed. Furthermore, because the very nature of technical canyoneering makes it impossible to know in advance if a fixed anchor is required it's easy to imagine that land managers would just prefer to close the area to canyoneering rather than conduct an unfunded mandate. This is unacceptable to us and incompatible with the purpose of the Wilderness Act in balancing preservation with accepted recreational activities, such as canyoneering, in Wilderness areas.

A better way:
Crowding in Wilderness should be managed by a permit system. For example, Zion National Park uses a permit system to provide canyoneers in slot canyons with a reasonable Wilderness experience. Fixed anchors are often used in Zion canyons. They allow canyoneers to more quickly progress through a canyon, avoiding crowding at anchors, and they can reduce environmental damage by ensuring the anchor is located at an optimum place so that ropes do not groove the soft Navajo Sandstone when pulled down. Grand Canyon uses a backcountry permit system consisting of zones covering large areas of the landscape to meet the Act, and an unseen canyoneer deep inside a slot canyon within the larger zone counts like a backpacker roaming the surface.

Where canyoneers find themselves in a situation where a bolt is the safest way to create an anchor, a self reporting system can be implemented so the land manager is notified and has a proper inventory of fixed anchors. This allows the land manager to determine if the fixed anchor should remain. It's important to note that we support the principles of the Wilderness Act, and high density bolting in Wilderness that congregates people in a small area (like a sport climbing area) is not supported by our members.

The Coalition of American Canyoneers has often worked with the US Forest Service and various parks and monuments including Grand Canyon, Zion, Arches, Capitol Reef, Death Valley and others to remove fixed anchors when unnecessary, maintain fixed anchors that need updates for safety, move fixed anchors to locations better for safety or the environment, or install new fixed anchors when floods have removed them. We have also worked proactively with land managers to assist with climbing and canyoneering management plans. We stand ready to continue our work with land managers to balance the right of our members to visit Wilderness, and the important work of preserving Wilderness so it's unimpaired for future generations.