

Data Submitted (UTC 11): 1/17/2024 2:57:40 AM

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Title:

Comments: I write this letter on behalf of the sport of Canyoneering. We need equal representation in our National Parks, Monuments, and recreation areas alongside caving and climbing. Canyoneering allows hundreds of thousands of people to visit remote corners of our public lands and experience some of the less accessible beauty our nation has to offer.

I've been canyoneering over 20 years in Southern Utah, Southern Nevada, and Northern Arizona. I have shared my passion for canyoneering with hundreds of youth from a variety of backgrounds. It is a special experience to see a teenager overcome challenges they didn't expect they could while visiting some of the most unique public lands available.

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 the following line -

"bolt-intensive face climbs is considered incompatible with wilderness preservation" (*page 5 6b FSM 2355 National Forest Service)

Canyoneering is not bolt intensive. Most bolts are in remote areas someone not participating in canyoneering would ever be able to see. The bolts that may be visible to the majority of wilderness visitors are at the entrance and exit of canyoneering routes. The bolts inside the canyons can be placed in such a discrete manner that it may take some time for even the canyoneers 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,

Eric Schroeder