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Comments:

Hello, my name is Rick Green and I am President of the American Canyoneering Association (ACA) and owner of Excursions of Escalante (EoE) a canyoneering guide service in Utah. I also volunteer on the Search and Rescue team in the Colorado Plateau of Escalante, Utah. The ACA is a group of canyoneering Members focused on offering public training and certifications through a series of workshops, courses, and assessments. EoE is our canyoneering guide service in the Grand Staircase Escalante Utah, operating for 25 yrs. In these roles and over the years we have been operating within the Federal Government's SRP system, including permits in Wilderness Areas within NFS, NPS, and BLM Lands. I am writing to provide some insight into our experiences on this topic and to offer a quick history of the fixed anchor discussions within the canyoneering community. Our goal is to illustrate that designating canyoneering fixed anchors as prohibited "installations" will be a detriment to public safety and in many cases will increase the environmental impact to canyons/Wilderness. I would not presume to speak for the majority of canyoneers, or to know more than yourselves on this important topic, but sharing our experience and understanding seems fitting at this time. We are hopeful it might prove useful in your efforts.

For background on the canyoning communities' level of understanding on this topic, the so-called "anchor wars" have been an intensely controversial item for several decades. Just like in the climbing, mountaineering, and caving communities in the chat rooms and around camps, people have vigorously debated the advantages and disadvantages of anchor systems, generally from the perspectives of legal authority, public safety, and environmental impacts. Initially, the canyoning group(s) were primarily against "bolting" under any circumstances, and years of focus went into developing super low-impact anchor systems. At that time, the thrust of American canyoneering was happening in the American Southwest, which has beautiful soft sandstone canyons that makes bolting look and feel very aggressive. Although it was easily determined that in certain circumstances bolts could vastly improve safety and greatly reduce the impact to the rock (trees/plants too), the visual senses compelled the brain to develop fairly complex but "low impact" anchor systems such as the Sand Trap, Water Anchor, Fiddle and Stick. Creating and understanding these "retrievable" systems has been an incredibly positive sea-change for the sport, but as time passes we see that those systems have some impact too. It is pretty clearly understood within the communities that fixed bolts are a critically important tool in the mitigation of environmental impacts and improvement of overall public safety.

The rules and regulations of putting fixed anchors in/on Federal Lands or in a Wilderness setting are indeed convoluted. Perhaps this is a positive thing, as these items can be managed locally or regionally, by people who are there working directly to find the optimal solution. Other times this appears to be a hindrance, as there is so much Land and processes to consider, the Administrators appear overwhelmed with options, unsure of exactly where to look for guidance. That's not to say there isn't guidance or precedence, there may well be, but for some reason(s) it isn't being seen as a basic solution by current Land Managers. For example, the GSENM has been putting together the climbing and canyoneering plan for 23 years and was just recently completed. Locally, they have had a consistent rotation of smart and well-meaning BLM Administrators working on this, but it appears that the challenges of ambiguity and limited resources (time), resulted in the climbing and canyoning community waiting over two decades for effective protocols to follow. Ultimately it seems like some clear legislation that is easily workable, promoting and supporting the local/regional administration of these fixed anchors would be a positive move.

Regarding public safety, the need for fixed anchors in some areas is clear, particularly as the sport continues to grow. For example, Zion National Park has larger and larger numbers of people canyoneering there regularly. Visitors of varying technical skill, experience, and fitness levels who are looking for a relatively safe and fun

adventure inside the Park. In these environments, a fixed anchor is by far the best solution. They can be used to create a secure staging (start) area, to optimize the location of people's descent on rappel, and/or to improve rope retrieval. These improvements to safety at Zion are MASSIVE, in my opinion, and cannot be overstated. Inversely, the terrain in Escalante has been kept almost entirely bolt-free for the most part, which means using natural anchors that you have built or were built by someone else. The latter being most common for the public. It is true that I've built and maintained most of the natural anchors on the canyoning routes here for well over 25 years without ever placing a bolt, but things are changing now. This GSENM has become quite popular for canyoneering and we are encountering more and more poorly constructed anchors. Some are overbuilt, but most are improperly constructed and dangerous. These natural anchors can be hard to accurately inspect and assess, so visitors most often end up "going for it" on an unknown anchor...which of course is not a great option. The fact is, that multiple groups building multiple anchors can get out of control quickly, leading to potentially major safety issues for the public. In the future, well-placed fixed anchors are likely going to be the safest and smartest solution, more and more of the time. Therefore, if fixed anchors become prohibited, and the only pathway to a fixed anchor authorization is a lengthy MRA process, I suspect public safety will become increasingly compromised, as existing fixed anchors require maintenance and new fixed anchors become needed in those popular destinations. After participating in numerous Search and Rescue campaigns, I can also add that safe, fixed anchors for rescue and recoveries have become a necessity due to the popularity of recreating in more remote Wilderness landscapes.

Environmental impact. When using the retrievable or natural anchors, the two most common forms of canyoneering impact are the disturbance of rocks, sand, water, etc to create the anchor, and/or the "grooving" of sandstone canyon walls/floors during rope retrieval. The rocks, sand, and water all create a habitat for plants and animals in the canyon, regularly moving or disturbing them to build anchors in a sensitive environment can have negative consequences. Our estimation is the fewer things get moved around the better for the plants and animals. The second issue, grooving or scarring of the canyons, has become terrible recently. Some of the natural and retrievable anchor systems require a certain amount of rope to pass across the rock during, retrieval and the soft sandstone can quickly become scarred with grooves. Grooving is not an inevitable part of the more advanced anchors, but the skill level required to mitigate this impact is not typical of recreational canyoneers. Our conclusion is that under certain situational circumstance, such as popular public canyon routes, placing fixed anchors can have much less impact on the canyon overall, than any other type of anchor. Essentially a few small holes in the wall and a few small items the size of a silver dollar exposed on the outside and that's it. Clean and simple with lessened impact over the short and long term, bolts are clearly an effective tool. We hope these environmental considerations point to the need to avoid a blanket prohibition on fixed anchors and instead continue to build upon the current practice of considering fixed anchors as not prohibited, and allowable as described in the National Park Service Director's Order 41.

That concludes this short summation of the he ACA's general understanding and knowledge of the fixed anchor. It is our sincere hope that there are some useful items contained within it all, we can be available to answer questions or go into greater detail if that should prove to be helpful. Thank you for all the efforts in the endeavor to protect and manage wild spaces on