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Comments: To better understanding the issues and need to change the National Park Service (NPS) 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") I have tried to read up on the issue and opinions. As a Pacific Northwest, Colorado, and Utah canyoner access to these areas are important to me, my canyoneering teams, clients I guide, kids I instruct and places I love to see stay wild. I am surprised to learn that such a change by NPS 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. Regardless of the need for such intervention as it relates to sport climbing, the impact of the Order when accompanied by the burdensome authorization process outlined in Draft RM41 will have a huge impact on my ability to guide clients and share with kids canyoneering in places I currently take them. Between fires, weather, route finding and other challenges of getting outside in nature, it seems so short sighted to create an unfunded mandate that will effectively result in closed areas and will likely increase the risk of an accident. People will continue to visit these areas regardless of the rules they may or may not know about. Those who follow the rules will be denied access, lose business, or must proceed at greater personal risk to themselves and their team without permanent anchors. Very likely there will be great damage to those places we are trying to protect. The logic of the mandate appears to avoid the work of understanding who is accessing these areas, how best to protect them and controlling impacts.

Such a mandate likely means Congress will be engaged to either redefine the 1964 Act or to remove certain areas from Wilderness designation if the rules go forward. 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. Other solutions exist already to protecting the wild spaces we all love so much.

Many of the technical canyons that canyoners seek to access are never seen by the public. There are canyons heavily traveled. These places need a permit system much like is in place in Zion - or closed at certain times during the year to protect wildlife (salmon or bird nesting). We want these areas to remain beautiful. It is why we visit them.

Canyoners like myself, are some of the best advocates for practices that protect our environment and wild spaces and why we used fixed anchors. While Native Americans usually didn't descend technical slot canyons, their fixed anchors are found all over the landscape. 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.

I 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. I disagree with the requirement that makes land manager review every fixed anchor installation (past and proposed). It is an unfunded mandate that

will result in closed areas. There will be no timely processing of applications or requests. 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.

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.

The firm I work at (not named) does a lot of work with the NPS and USFS. I am lucky to have heard about this issue and have a chance to provide comment. Many people will not have had a chance to provide comment by the time the comment period closes January 30th. If enacted, this mandate will close guide businesses, canyoneers in the NW will be further disenfranchised with the NPS and USFS beyond the complicated requirements, permitting system and regulations already in place. Litigation will happen at several levels. People will get hurt in canyons trying to use a "ghost" system (going without a fixed anchor) and more damage will occur from people anchoring to trees, rocks and other natural systems.