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First name: Nicholas

Last name: Clegg

Organization:

Title:

Comments: 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 (CAC) was formed in 2011 to advocate for recreational canyoneering access in the US. The members support preserving Access through Conservation, Education, and Safety (ACES). During the last decade, as canyoneering has grown, CAC has 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. CAC is 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, Forest Service Manual 2300 (FSM2300) reverses almost 60 years of precedent by defining installations under the Wilderness Act of 1964 to include bolts and textile slings, 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, FSM2300 seems 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 FSM2300 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 US Forest Service (USFS) risks damaging the relationship and 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 USFS acted properly under the Act. Rather than cause such conflicts, the USFS 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 removed from the environment by the canyoneering community. More recently, advanced anchor techniques have been developed to leave nothing behind in certain situations (known as 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 FSM2300 is simply not reasonable or practical in addressing canyoneering fixed anchors for the thousands of published and unpublished canyons throughout the country. For every canyon descent, canyoneers must inspect every anchor and anchors are often 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 in a canyoneering context, specifically, 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 FSM2300 is simply not possible for placement or replacement of every fixed anchor in a canyon. Having the ability to install a fixed anchor can and has been 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 placed in very precise locations to route a canyoneer away from powerful water flow or water features such as hydraulics, sieves, undercuts, etc. and prevent drownings. 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 in (and carry out) all of the rope(s) and other gear in a backpack.

? While Native Americans typically have not descended technical slot canyons, their fixed anchors are still 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 I fundamentally disagree with defining a bolt or sling 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), FSM2300 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 appears to be no additional funding accompanying this new mandate. Adequate resources are required to effectively manage our Federal Lands, and such resources are severely limited. 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 me and to our community and incompatible with the purpose of the Wilderness Act in balancing

preservation with accepted Wilderness recreational activities, such as canyoneering.

Regarding anchors outside of Wilderness areas, 2355.31 states:

"3. Restrict the placement and replacement of fixed anchors and fixed equipment to established climbing opportunities and to approved new climbing opportunities that have been evaluated for natural and cultural resource impacts..."

As previously discussed with regard to Wilderness areas, it is not reasonable or practical to implement an approval process for canyoneering anchors. Further, it is not clear what approval process might be used to evaluate new opportunities for natural and cultural resource impacts. This section should be changed to clarify that it is meant only to restrict "...extensive or arbitrary placement and replacement of fixed anchors and fixed equipment without regard to rock features that provide natural opportunities for ascent and descent, such as where fixed anchors and fixed equipment are placed or replaced at a location that is otherwise climbable purely to make the climb easier, as opposed to at a location that is not otherwise climbable to enable a climber's ascent and descent of a climbing route identified in the applicable climbing management plan."

A better way:

Crowding in certain Wilderness areas 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 commonly used in Zion canyons, and rarely are visible or accessible to anyone except canyoneers. These anchors allow canyoneers to more quickly and safely progress through a canyon, avoiding crowding at anchors, and they can reduce environmental damage by ensuring the anchor is located at an optimal place so that ropes do not groove the soft Navajo Sandstone when pulled down. Rope grooves can have significant impact on soft rock types and are often only avoidable via bolt installations in specific locations where natural anchoring features do not exist. 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 could 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 I support the principles of the Wilderness Act. High density bolting in Wilderness (i.e. a sport climbing area) is, however, vastly different from bolt placement in remote watercourses embedded deep within the confines of narrow canyons which are completely invisible and inaccessible to nearly all humans who share these Wilderness spaces and practice non-canyoneering recreational disciplines. We should be intentional to distinguish between these two activities (rock climbing vs canyoneering) for which this is a substantial degree of variation.

The CAC 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. They have also worked proactively with land managers to assist with climbing and canyoneering management plans. Furthermore, the general canyoneering community is overwhelmingly invested in stewardship and preservation of outdoor spaces, including Wilderness. In addition to being in a unique position to remove trash that is washed into these otherwise inaccessible locations, many canyoneers perform volunteer work in their local communities and often in partnership with the US Forest Service. America's canyoneers plan to continue this work with land managers to balance the right of the community to visit Wilderness with the incredibly important work of preserving Wilderness so it remains as wild, pristine, and unimpaired as possible for future generations.

Thank you for your consideration of these comments.

Nicholas Clegg