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Comments: Hello, my name is Sam Keller. I own a swiftwater canyoning guide service based out of Seattle Washington. I am also a trained canyon guide through the International Canyoning Academy, with 16 years of experience canyoneering around the world. I began canyoneering in the wilderness of Zion National Park, the same canyons whose access would be threatened by proposed regulations.

My whole life I have believed that public lands are America's greatest idea. Our greatest resource, and something that needs to be treated with respect and responsibly. I have worked closely with the NPS in Mount Rainier National Park, Zion National Park, Bryce Canyon National Park, and Canyonlands National Park as a conservation corps technician. I have seen firsthand both the mission of Land Managers, and the constraints that their budget and unfunded mandates impose on them.

Canyoning is at its core an adventure sport. It is also a sport completely dependent on access to public lands for its growth. We are a small, but growing, user group who celebrate our Freedom every time we go into a new canyon. We are the embodiment of the purpose of the Wilderness Act which states "wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."

We are the public, we are recreating, we are educating ourselves, learning not just about rope systems and wilderness travel, but also about the very places we are exploring. According to the European study "Critical question of the sport Canyoning from an ecological point of view in the Bavarian and Tyrolean Alps" by Schmauch in 2011 found that the ecological impact of canyon travel was almost non-existent because the sport of canyoning passes through the floodplain. Thus the evidence of human passage is non-existent within minutes of a flooding event.

Now that we have established that canyoneers are a legitimate user of wilderness, we must move on to the threat that this new "interpretation" of a decades old legislation has to the continued development of the sport and the economic security of communities and families that rely on canyoning and canyoneers.

It is a perennial story that Land Managers are underfunded and have too many unfunded mandates and responsibilities. As a guide service I am constantly running into this reality. Land Managers are too busy to evaluate every permit request that I submit. And I am only submitting 2-3 a year. How can we expect them to be able to educate themselves and become experts on the subject of sustainable bolting in inaccessible terrain that can only be accessed using advanced canyoning techniques? It's impossible, they don't have the time or the funding.

The answer to these types of problems are not adding more paperwork and unfunded responsibilities for land managers. Land managers don't want these new regulations, they already have enough to do. The public doesn't want these new regulations, they widely support access for canyoning and climbing. The Wilderness Act was never meant to be used as a cudgel to create bureaucratic red tape as a means to exclude legitimate use of public lands. This is proven by the fact that bolts have been placed by hand in wilderness areas for the entirety of the existence of The Wilderness Act.

I write today, both as an adventurer and a business owner, to express my profound disapproval of this new bureaucratic mechanism to overload land managers and prevent legitimate access to our public lands. Let this issue progress through the legislature where it belongs.