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Comments: Hello!

I am an avid canyoneer in Colorado. I have some concerns with the new proposal to limit or ban bolts aka 'fixed anchors' within wilderness areas unless an MRA is completed. The areas I most frequently descend often begin in wilderness areas and sometimes the entirety of the canyon is within the wilderness so these rules directly affect my ability to participate in my favourite recreation.

While I appreciate the similarities between climbing and canyoneering in terms of land management, there are also significant differences in the sport and it's visual impacts for other visitors. Because climbing is an upward sport, you can always retreat back the way you came if the terrain becomes too difficult. Canyoning however, based on it's downward progression, is a one way sport with little to no chance for retreat back up canyon in most circumstances. Because of this process fixed anchors are often necessary to allow for forward movement within the canyon as natural, "ghost"able anchors are not always available. In addition, flash flooding can cause significant changes to the canyon during a single event such that anchors that have existed for years could be gone with no notice. The ability to build and place new fixed anchors, sometimes including bolts, is a core component of the sport. In regards to the impact that fixed anchors can have on other visitors to the area, canyoneers generally understand the need to limit visual impact and will attempt to use natural colored webbing that blends in with the surrounding rock or vegetation, especially in areas visible to non canyoneering visitors. Additionally, in many canyons, any fixed anchors would only be visible to those who are participating in canyoneering as others will not be able to access the canyon bottom without ropes and rappelling. And finally, in many cases, the building of a fixed anchor allows for better protection of the canyon itself from unsightly wear and tear. Especially in areas with softer rocks such as the sandstone found throughout a significant portion of the Colorado Plateau in Utah, natural anchors often exist in places that require pulling ropes across ledges and edges of stone when retrieving ropes and this can and has caused deep rope grooves to form at some rappels. A well placed fixed anchor that allows the rope to be pulled freely causes significantly less damage to the rock itself and maintains a much more undisturbed wilderness experience.

In summary, While I applaud efforts to protect wilderness areas and keep them wild, I have concerns that the proposed changes don't adequately consider the basic requirements of the sport of canyoneering and that the limitation of fixed anchors with an arduous process to gain approval for their placement will severely and inappropriately impact the canyoning community. I urge you to explore other options for managing the impact in popular areas and consider that canyoning may need different rules than climbing in regards to fixed anchor placement.

Thank you for your time,

Ruth Stewart