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Comments: The 1964 Wilderness Act is an incredibly important foundational piece of legislation that established the legislative idea that man should have places to roam, explore, and visit where earth and community of life are untrammled by modern man's developments. The exploration of slot canyons in America's vast wilderness areas fundamentally illustrates this uniquely American idea.

I'm 59 years old and I've spent more than half my life (and over 1,300 days) roaming the remote backcountry in Grand Canyon National Park. The vast majority of Grand Canyon NP is proposed Wilderness. Starting with a commercial river trip in 1989, I became absolutely inspired by the landscape. I started hiking established trails in the early 90's then began venturing off trail in remote areas in the mid 90's. By the late 1990's, I became interested in the hundreds of slot canyons deep in the limestone layers thousands of feet below the rims, and to this day, I continue to explore new slot canyons and visit old favorites with friends. Most of these slot canyons require technical gear for descents. In addition to technical rope gear, it's common to need a lightweight packraft to escape down the Colorado River for short distances until a break in the cliffs allows escape back to the rims. These complex, multi-dimensional, multi-day adventures have allowed my friends and I to see some of the most stunningly beautiful landscapes and microenvironments imaginable, reinforcing the reason that Grand Canyon National Park is one of America's most treasured places.

Slot canyons are subject to frequent flash flooding. Some of these floods are quite violent, moving vast fields of boulders, mud, water and debris perpetually carving these places ever deeper. The etiquette in Grand Canyon canyoneering is to use the plentiful natural features in the canyon for anchors, however, it's occasionally required to place a bolt in the rock to allow safe progress down a slot canyon. Out of many thousands of anchors I've established in Grand Canyon over the years, I've only needed to place bolts approximately 20 times. It's rare to need bolts for an anchor. Unfortunately, it's impossible to know if obstacles exist beforehand that necessitate a bolt anchor to avoid being trapped. This is especially true when exploring new slot canyons that have not been descended before. Not carrying a bolt kit on exploration routes is a suicide pact. No amount of Minimum Requirements Analysis under the Act for a fixed anchor will change this fact. Slot canyon hallways can be as smooth as a granite countertop with no features for a natural anchor. Estimates on rope lengths for passage can be wrong requiring fixed anchors midwall to safely get down. Keeper potholes can appear with low water in droughts forbidding a swimming escape without using hooks, or rarely bolts, to escape the trap. These challenges make canyoneering interesting and fun to many people while allowing them to experience the stunning beauty of our Wilderness areas.

The NPS position on fixed anchors (bolts, webbing, etc.) is a misguided interpretation of the 1964 Wilderness Act that wasn't used for the first 50+ years of the Act's existence. The reinterpretation of the Act to forbid these installations will cause countless canyoneers, mountaineers and climbers to reconsider their support for this uniquely American idea. Indeed, there are amazing examples of fixed anchors used by Native Americans in Grand Canyon including logs in cracks to aid climbs, log bridges over airy gaps in the landscape, log ladders, stacks of rocks, etc. that aided in ancient travel throughout the landscape and remain in place today. The judicious use of bolted anchors deep inside slot canyons (invisible to surface hikers) is just a modern twist of a long history of human powered travel in Wilderness. Furthermore, these fixed anchors aren't really fixed at all. They're subject to the violent whims of nature as she carves these places ever deeper and wider.

I'm profoundly in favor of the 1964 Act, and can recognize instances where the use of fixed anchors for sport climbing violates some fundamental tenets of the Act creating instances of crowding in small climbing areas. The idea that policy makers in Washington DC are trying to solve this issue by banning fixed anchors is absolutely perplexing. Each of America's wilderness areas are unique. The local land managers are the best judges to determine how to manage the landscape under the tenets of the Wilderness Act. Furthermore, local land managers have been employing permit systems for years to keep crowding under control. Management of current fixed anchors is done for free by local organizations with expertise in placing and removing these anchors under the direction and with the consent of the local land manager. I implore the DC policy makers to allow the

local land managers to manage local fixed anchor issues with tools they often already use today. Banning fixed anchors, or effectively banning them through burdensome and costly bureaucratic requirements under the 1964 Act, are unnecessary and unacceptable. These actions can lead to area closures and invite litigation that potentially thrusts the central tenets of the Wilderness Act to judicial review with unknown consequences.