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Comments: My perspective on fixed anchors comes from the sport of canyoning (also called canyoneering). After receiving some introductory training, my husband and I began to explore dry or low-flow canyons in national parks, national forests, and BLM land across southern Utah and the desert Southwest. In the past seven years, and as we learned new skills, we've had the great joy of joining small teams of other like-minded outdoor explorers to explore swiftwater, flowing canyons all over the western US. Safe, sustainable access to these incredibly special places is a benefit of priceless value to me.

My canyoning community has included me and empowered me, a middle-aged woman, to be a part of many teams. A well-bolted technical canyon reduces the need to be an elite athlete or a "seasoned outdoor explorer" to be an asset on a team. Bolted anchors allow a much broader group of outdoor enthusiasts, including those who are brand new to the outdoors, to not only experience full immersion in a remote place, but also experience them as a valued teammate.

The USFS Minimum Requirements Decision Guide lists as its policy objectives: Protect and perpetuate wilderness character and public values including, but not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences. Fixed anchors in a canyon promote these values in an equitable way, allowing more of the public to benefit from these stated objectives.

In aquatic canyons, teams must prioritize managing the risks of water hazards. This means that anchor managers must be stationed at the edge of a drop so that they can communicate with the rappeller to ensure the rope is set with precision, and so that they can help facilitate any problem-solving. Additionally, anchors must be placed so that the fall line avoids any major aquatic hazards. These safety objectives should be considered the minimum safety requirements for the public to experience aquatic canyons in wilderness and non-wilderness alike.

The canyoning community in the US is very connected, and our approach to canyon travel (and all off-trail travel) is centered on minimizing human impacts on the resource. The community engages in ongoing conversation about ways to continue to protect the primitive nature of our canyons, and how to adjust our strategies so that they are appropriate for the environment. High-travel canyons - those that have easy access or low technical barriers - need special considerations. For example, 6-8 parties a year using a retrievable anchor around a tree will likely retain the wilderness character. But 6-8 parties a week during peak season using a retrievable anchor around that same tree will erode the roots as they access the tree, and strip the bark as they pull the anchor to retrieve it. For a high travel canyon, bolts can greatly reduce the impact by keeping all travel on durable surfaces. This is just one example to illustrate the importance of land managers working with canyoneers who can inform decisions in the best interest of the wilderness purposes. National guidance prohibiting bolts presupposes that the agency leaders are experts in whether bolts achieve the purposes of the Wilderness Act, and that a one-size-fits-all approach will meet the same goals for a huge diversity of land.

Most Forest Service Districts and National Parks lack the staffing needed to respond to basic permit requests, much less conduct a NEPA process. Requiring an MRA for any bolts in wilderness, including existing bolts, is irresponsible without identifying a dedicated fund to provide the resources for this. This unfunded mandate will surely lead to bolting permit moratoriums, an absurd outcome that wholly fails to meet the stated purposes of the Wilderness Act.