Data Submitted (UTC 11): 1/3/2024 6:43:15 PM

First name: Adam Last name: Elson Organization:

Title:

Comments: I'm writing today to share my perspective on the newly released draft policies that would make fixed anchors (bolts, pitons, slings) prohibited in America's Wilderness areas. As a climber, a college educator in an adventure leadership degree, and simply someone who cherishes the vast wilderness, I object to this proposed policy. These policies would overturn nearly 60 years of sustainable Wilderness climbing precedent. As agents of the public, you must address the question as to what is the need to overturn a practice that is indeed proving to work well. It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. Furthermore, prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

Prohibiting fixed anchors also obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

Lastly, restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Kind Regards,