

Data Submitted (UTC 11): 1/6/2024 4:47:27 PM

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Comments: I am writing to express my concerns and objections to the proposed policy changes regarding fixed anchors in Wilderness areas. The use of fixed anchors in climbing has been a vital component of climbers' safety systems for decades, and the established climbing policies have successfully allowed for the judicious use of such anchors without compromising the Wilderness character. I believe that implementing new guidance policies to prohibit fixed anchors across the country is unreasonable and could have detrimental effects on the safety, exploration, and preservation of America's climbing legacy.

Firstly, it is important to emphasize that fixed anchors are not prohibited "installations" under the Wilderness Act. Climbers have been following existing policies that permit the responsible use of fixed anchors for over 50 years. Rather than imposing new restrictions, adhering to these established policies would contribute to the protection of Wilderness character while facilitating primitive and unconfined climbing experiences.

The proposed prohibition of fixed anchors raises concerns about safety. The climbing community has taken on the responsibility of regularly maintaining these anchors. Imposing unnecessary obstacles to this maintenance process could lead to safety issues, as critical decisions often need to be made in the moment. Any authorization process for fixed anchor maintenance should be streamlined to avoid impeding these decisions and incentivize safe replacement, ensuring the integrity of climbing routes.

I have had to leave fixed gear on remote routes under duress for my safety and the safety of my team. Under the proposed regulations this would have been an illegal act, and I might have been forced to choose between criminal activity and protecting my life and the life of my partner. I have also been deeply involved in route maintenance, removal, and replacement of unsafe fixed hardware (bolts, anchors) in Colorado. If we had to go through a complex application and review process for this safety mitigation, it is possible severe accidents resulting in injury or death might have occurred while waiting for approval. We have a strong system in our area (Front Range of Colorado) where new routes go through an approval process (which involves a committee of climbers, I have served on this committee for several years, and experienced route developers as well as public officials). Under this system, we can resolve unsafe situations through immediate measures of replacing bad hardware.

The proposed policy could obstruct the appropriate exploration of Wilderness areas. Climbers should be allowed to navigate complex vertical terrain with the flexibility to make in-the-moment decisions. Prohibiting fixed anchors would limit climbers' ability to explore these areas responsibly, hindering the very essence of Wilderness adventure.

The proposed restriction on the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and risks creating confusion amongst land managers and climbers. My fear is that the inability to enforce the restriction would lead to a blanket ban on all climbing activities. 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. It is crucial to strike a balance that allows for the evolution of climbing opportunities while ensuring the preservation of sensitive areas - which is something that climbers also care deeply about as we feel we are stewards of our public lands.

Finally, the proposed policy poses a threat to America's rich climbing legacy and the world's greatest climbing achievements. Climbing management policies should aim to protect existing routes from removal rather than jeopardizing the accomplishments of generations of climbers. Preserving our climbing heritage is essential, and any policy changes should be crafted with the intention of upholding and promoting this legacy.

In conclusion, I strongly urge you to reconsider the proposed policy changes and to continue supporting the responsible use of fixed anchors in Wilderness areas. By doing so, we can strike a balance that ensures the safety of climbers, promotes exploration, and preserves the rich climbing heritage that is an integral part of America's wilderness experience.

Thank you for your time in reading these comments.