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Comments: I'd like to start my public comment by stating a few things about climbers in general. Climbers want to keep wilderness areas wild and value everyone's enjoyment of these spaces. Climbers want to protect natural areas and do things to preserve natural spaces. Climbers want to explore and enjoy vertical terrain. Many climbs require fixed anchors for tops of climbs or rappelling stations to get down from climbs - two small stainless steel bolts and some chains are often all that is required at the top of a climb which can last decades. These anchors are hardly visible from the ground unless you are trained to look for them and bolts in general can be very discreet while adding significant safety margin to climbers. Climbers are going to climb and the prohibition of installation and maintenance of these anchors or the potential additional hurdles proposed here threaten the safety of climbers.

Below are the recommendations from the Access Fund on this important issue and I agree with them.

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.

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.

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 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.

Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

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.