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Comments: Rock climbing is a largely unobtrusive activity that provides opportunities for personal development, the pursuit of athletic expertise, and unique interaction with our land. I am 26 years old and an attorney practicing construction and insurance law. I am an Eagle Scout, a former NCAA D1 runner, and have been a climber for nearly a decade. Physical, mental, and spiritual growth are pillars of my life, and American Wilderness has facilitated opportunities for each of those in many forms. Climbing has given me new perspectives, personal and physical goals, and helped facilitate some of the most important relationships in my life. Notably, I believe the qualities offered by climbing are distinct from those offered by long distance running or any other activities I have participated in and so are worthy of preservation.

Fixed anchors are an essential part of ensuring these experiences may be sought out in a safe and historically accepted manner. Notably, though climbers have long strived to engage in "clean" climbing that damages the rock in the most minimal way possible while also considering individual safety, bolts actually facilitate this goal compared to other historic climbing technologies such as pitons, which were typically removed during the same ascent they were placed and whose prolonged use scars and enlarges crack systems. Following historical precedent under the Wilderness Act, bolts are not "installations" prohibited under the Act. In fact, compared to other historic methods that were also permitted under the Wilderness Act, bolts are less intrusive and their judicious use is likely to protect both Wilderness character as well as the gamut of adventures to be had therein. Additionally, as an individual that has examined and participated in access conversations from the midwest to the southwest, it is unreasonable for federal agencies to reverse their long stance of allowing, managing, and authorizing fixed anchors and create new guidance prohibiting the same.

Moreover, and perhaps more importantly, prohibiting fixed anchors will create safety issues by artificially and arbitrarily limiting the ongoing maintenance of fixed anchors (a responsibility undertaken by the climbing community at large). Critical safety decisions often must be made with expediency, and any authorization process is extremely likely to impede those decisions and eventually result in serious injuries and deaths. In part, this is because the routes already exist-in many cases, a climber would not be able to tell if the anchor necessary for descent would be present or in serviceable condition for retreat until descent/retreat was necessary; however, in such circumstance, a climber would be without recourse.

Similarly, restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion among 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.

Further, fixed anchors are necessary to carry out the purpose of Wilderness land, such as appropriate exploration. Land managers should continue to allow climbers to explore the vertical challenges American Wilderness presents.

Finally, a historical plea is necessary: climbing achievements have long fascinated and been celebrated by Americans regardless of whether they participate in the sport or not. While banning new fixed anchors would obviously hamstring the cutting edge of exploration and American excellence on the world stage, inadequate upkeep of historical routes would relegate them to obscurity and threaten historical achievements.