

Data Submitted (UTC 11): 1/30/2024 6:34:33 AM

First name: Justin

Last name: Wade

Organization:

Title:

Comments: * This policy proposal is an absolute affront to the spirit of American adventure, exploration, independence, and self-reliance. In fact many peaceful, tranquil, and beautiful places in our country are otherwise inaccessible via any other no-impact or low-impact means. 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. Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers must allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

* The climbing community on the whole, while expanding rapidly, is a self-policing and innately self-filtering one. Climbers are inherently sensitive to their impacts and aware of their actions risking not only peaceful continuing access, but their own life and limb. Few sports/activities have such a grave risk to self that serves to automatically weed out those who don't learn to be safe custodians of themselves and their surroundings.

* The default position of most regulators is almost always "NO". When given the option, it is simply "safer" for a regulator to just disallow any questionable or unfamiliar activity. This happens in businesses, communities, and most especially in government bureaucracy when competing allegiances or responsibilities become contradictory, overlapping, or confusing. Rather, the default guidance should be to structurally encourage and even require a regulator to allow/permit/approve any such lawful, appropriate activity or behavior and thereby remove any bureaucratic barriers or mechanisms for the lazy, disinterested, or authoritarian-intentioned administrator to lean upon. This policy proposal does the opposite, by broadly and generally giving regulators a default position to deny climbing across the board, if so desired.

* A myriad of volunteer climbing communities have had to challenge for years and in some cases decades to gain or regain access to areas cut off by inconsiderate, litigious, nervous, and/or ignorant private land-owners, commercial land-managers, and local/state/national regulators. This battle costs unnecessary time and money, taking away from both sides that which could be better spent on maintenance, improvement, and enjoyment. Imagine for example that this policy was applied equally to hiking, mountain biking, horse-riding, or bird-watching? What would be the point of such a National Park or Wilderness? Camping and RV'ing is a much higher impact activity and is constituted by many people who are poor custodians of themselves and their environs. So why then is climbing, a relatively low impact activity by percentage, being treated differently?

* Fixed anchors are an essential piece of a climbers' safety system and should not be prohibited "installations" under the Wilderness Act. Most fixed anchors are extremely difficult to see even for the climber on or at the base of a route, let alone an untrained eye standing a mere 20 feet away. 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 typically by the climbing community itself via experts who are well trained and experienced specifically in climbing. 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. Having well-maintained fixed anchors reduces the risk of lesser-experienced climbers from serious injury and death, and reduces the need and likelihood for emergency rescue operations which require many rescuers, are risky, and can damage the environment much more than the activity itself.

* Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is perhaps the most insulting part of the policy. It's pretending as if to say there is nothing yet unexplored or undiscovered for climbing so it is not worth looking. New climbing routes are discovered, curated, and disseminated in the community almost every day. Approximately 60 new routes in one small area of Maryland

were discovered during the COVID 2020-2022 time period alone. Had these been in Wilderness or non-Wilderness lands under this policy, they would not exist; instead dozens of people enjoy the peaceful challenges of climbing here every day. The policy is unenforceable lest we live in a police-state of constant surveillance. Non-Wilderness climbing management policy should encourage and even require opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.