Data Submitted (UTC 11): 1/17/2024 9:08:42 PM First name: Benjamin Last name: Luedtke Organization: Title:

Comments: As not only a recreationist and climber, but also a professional guide working in the mountain guiding industry in wilderness areas around the United States, it is simply unsafe, bad practice, and completely irresponsible to stop the use of fixed anchors and attempt to eliminate policies that are already in place. Our government and land managers should be working to IMPROVE what already exists, not demean or eliminate it.

\*MORE THAN ANYTHING AS A PROFESSIONAL IN THE INDUSTRY. YOU ARE NOT JUST PUTTING PROFESSIONALS AND CLIMBERS AT RISK, BUT ALSO THE GENERAL PUBLIC. WE CONSTANTLY SEE NEW, NOVICE PEOPLE GOING OUT ON THERE OWN TRYING TO LEARN HOW TO CLIMB. IF THESE POLICIES DO NOT STAND AND ARE NOT IMPROVED, WE WILL SEE MORE ACCIDENTS AND RESCUES IN WILDERNESS AREAS. THIS PUTS SEARCH AND RESCUE PERSONNEL, PARK RANGERS, EMS, MOUNTAIN PROFESSIONALS, AND MANY MORE PEOPLE IN DANGER WHEN THEY ARE DISPATCHED TO MAKE THESE RESCUES.

## IN ADDITION:

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.