Data Submitted (UTC 11): 1/19/2024 5:49:41 PM First name: Benjamin Last name: Smolinski Organization: Title:

Comments: 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.

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.

As a route setter myself, I believe fixed anchors are absolutely crucial to providing a safe and inclusive environment for climbers, spectators, and other outdoor recreational users. I have seen first-hand the benefits that fixed anchors provide after bolting multiple outdoor routes at my college in Washington State. Bolting provides a safe way to approach climbing. This allows all skill levels to learn as well as provides as a way to strengthen the community and support for park land and outdoor recreationists as they can come together on a common focus.

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 absolutely creates 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 shuts of access to many climbers as well as lower income recreationalists as a trad rack (a way of protecting a climb without fixed anchors) can cost upwards of one thousand dollars. Additionally, a lot of climbs cannot be safely protected against falls without fixed anchors due to featureless rock.

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.