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Comments: Fixed anchors are an essential part of climbers safety system and have never been considered prohibited "installations" under the wilderness Act. Climbers have judiciously used anchors for more than a half-century and their use has maintained the wilderness character of the areas in which they are used. The new guidance that is proposed is unnecessary and reverses decades of policies that have been in place across the country. Prohibiting fixed anchors will create innumerable safety issues and unnecessary risks and obstacles to regular use and maintenance of current climbing usage. When anchors are installed critical safety decisions must be made in the moment and an authorization process would get in the way of these decisions. Any fixed anchor policy must be utilized in such a ways that incentivizes safe anchor replacement and does not risk removal of historic climbing routes.

Prohibition of fixed anchors will obstruct appropriate and accepted exploration of wilderness areas. Land managers must allow climbers to continuously explore the wilderness in a way that permits in-the-moment decision that are needed to navigate the complex and varied vertical features. Prohibitions like the ones suggested will threaten a historic usage wilderness usage and the rich and stories legacy of American climbing. Many of the world's greatest climbing achievements would not have been possible without the use of fixed anchors and any climbing management plan must protect the existing and historic routes.

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.