Data Submitted (UTC 11): 1/29/2024 8:33:29 PM First name: Susan Last name: Vennerholm Organization: Title:

Comments: Thank you for hearing my opinion and comments about the proposed changes to rules on fixed climbing anchors in Wilderness Areas.

As a long-time climber and user of wild areas (Wilderness and non-Wilderness), over the years I have used many fixed anchors on climbs. In many situations, I've been thankful for the obvious maintenance that other climbers have done on fixed anchors on technical peaks and rock climbs - most of which were miles away from and thousands of feet above the trailhead. I can't imagine the disasters that may have happened for myself or countless others if this had not been allowed in a timely manner by the climbers on routes.

In response to the proposed rule changes:

Fixed anchors are essential to climber safety. They are not prohibited "installations" under the Wilderness Act. Our country must follow existing climbing policies that allow judicious use of fixed anchors; this will protect Wilderness character while providing for primitive and unconfined Wilderness climbing - as well as help support the safety of citizens using our wild areas areas.

It is unreasonable, and a risk to climbers, 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 on any given climb, and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that supports 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. Climbing management policy needs to protect existing routes from removal.

Lastly, 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, not to mention an added workload on already-understaffed wilderness agencies. 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.

Thank you,

Susan Vennerholm