Data Submitted (UTC 11): 1/30/2024 10:36:17 PM First name: Lala Last name: Wu Organization: Title:

Comments: I disagree strongly with the proposed rules. I am a recreational rock climber and a mother of a young child. My first exposure to climbing was through a public school program on public land. This experience inspired a love of nature. This also set me on a journey to understanding the importance of not only relishing in the joy of the wilderness, but also protecting it and learning how to be safe. I enjoy the great outdoors -- including through climbing -- with my family frequently, and hope to instill in my daughter these lessons, but the proposed procedures would severely limit that possibility.

1. Fixed anchors play a vital role in climbers' safety and are not "installations" banned by the Wilderness Act. Climbing without fixed anchors would not just be unsafe (like riding in a car without a seatbelt), it would be impossibly dangerous (like riding in a car on the freeway on a faulty chassis without a seatbelt, doors, or frame). Existing policies are effective in safeguarding Wilderness character and ensuring safe climbing experiences.

2. It is unreasonable for agencies to create new policies prohibiting Wilderness climbing anchors when they have allowed, managed, and authorized fixed anchors for decades.

3. Restricting fixed anchors will increase instances of death and injury by hindering critical maintenance, typically handled by the climbing community. Safety decisions must often be made on the spot under quickly changing weather or other circumstances, and any approval process would put climbers in the impossible position of choosing between fixing what they know is a dangerous situation, and following the law.

4. Restricting fixed anchors blocks appropriate exploration of Wilderness areas. Climbing outdoors has inherent risks, but fixed anchors are a minimally intrusive yet massively helpful tool that allow climbers to explore Wilderness areas appropriately.

5. Restricting fixed anchors would threaten America's rich climbing legacy, and could make completely inaccessible some of the world's greatest climbing achievements. This legacy has inspired untold numbers of people -- particularly young people -- to explore, understand, respect, and protect the great outdoors.

6. Restricting fixed anchors is not an effective way to control visitation. There are popular climbs without fixed anchors (e.g. crack climbs where you can walk off) and there are climbs with fixed anchors that see very little traffic. More effective ways to control visitation already exist and are effective, including reservations, quotas, and limited parking.

7. 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.

Please consider making the following changes:

A. Fixed anchors are not "installations" for the purpose of the Act and that existing management rules (i.e. the prohibition on motorized drills, restrictions on disturbing nesting raptors and archaeological and sacred sites) are sufficient.

B. Climbers should retain the discretion to replace existing anchors as needed. The Service may continue to evaluate routes and close them only if the routes result in unacceptable risks to other forest users or damage to

natural resources.

Protecting climbing protects Wilderness areas, and helps to ensure that they will have faithful stewards for years to come. Thank you for considering my comments.