Data Submitted (UTC 11): 1/31/2024 1:27:44 AM First name: Emm Last name: Zorensky Organization: Title:

Comments: I am writing today to urge you to reconsider the proposed guidance that would make fixed anchors prohibited in Wilderness areas.

Maintaining and protecting our wilderness areas is of the utmost importance and I do recognize that continuing to develop policies that ensure a future for sustainable climbing is of the utmost importance. My understanding is that the goal of the guidance is to help outline a clear plan for sustainable climbing; however, after having read it, I have major concerns about how it would be implemented and believe that it would have the opposite effect. My concerns are that as written, the proposed guidance would greatly restrict the future of climbing in the US and subsequently undermine the very objectives at the heart of this proposed guidance.

Fixed anchors are a key part of ensuring safe climbing. It is undeniable that their prohibition would dramatically impact both the historical routes that have been set in parks as well as have bearing on overall safety of climbing in Wilderness areas.

The proposed procedures for approval of fixed anchor placement, and more importantly, replacement, lacks awareness of the real time safety decisions that often need to be made around anchors when climbing. Although the proposal does outline a mechanism for submitting anchor replacements for approval, the authorization process outlined and its corresponding timeline is not realistic given the complexities associated with navigating vertical terrain and would subsequently create additional safety issues.

Lastly, my understanding is that per the guidance, the recommendation is to restrict the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands. This sounds unenforceable to me - and seems like it will create nothing but animosity and confusion between land managers and climbers. There is a world in which both new anchors and continued exploration of the vertical world can go hand and hand with the appropriate protection of cultural and natural resources. A blanket restriction to "existing climbing opportunities" would not do this.

I truly believe there are ways to better work with existing climbing policies that allows the judicious and conscientious use of fixed anchors than what is proposed in this guidance. There is a place for climbing with fixed anchors in the appropriate exploration of our wilderness areas and I sincerely hope you will revise the guidance.