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Comments: I am writing to suggest some refinements to the proposed regulation of fixed anchors. I first began climbing as a teenager, in about 1985, when I was taken up an (otherwise unprotectable) sparsely bolted three-pitch face climb. This experience changed my life. In the decades since, I have sought out precisely the values expressed by the Wilderness Act of 1964- primitive and unconfined, often alone- in remote and not-so-remote places, some of which are designated Wilderness. Living for over half of my adult life next to the Mt. Massive Wilderness (Pike-San Isabel NF) in Colorado, I spent many days exploring and climbing on the granite visible out the back window. I was once caught out on a crumbling face, well above my removable anchors on a crack below, in an intense summer lightning storm swirling around the 250' spire. I placed- by hand- a pair of quarter-inch bolts as an emergency descent anchor, and returned home safely. That climb (with a revamped, safer anchor) now affords people the opportunity to experience this terrain without fear of stranding. It has not become overrun. Despite an approachable difficulty grade, and publication in the local guidebook, the crag remains rarely visited and even the grass at the base shows little sign of human impact. The rock-colored, camouflaged stainless-steel anchor is tough to spot -- "substantially unnoticeable" in the words of the Act-- even if you know where to look. In the many days that I spent there, I never saw a hiker wander over from the popular Windsor Lake trail a quarter mile away.

I support the ambitions and effects of the Act, but I believe that a 180 degree policy reversal in the case of fixed anchor management is a misguided application of the intent of the legislation. Here's why:

1) Fixed anchors are not 'installations' as per the intent of the Wilderness Act. The Wilderness Act came along decades after climbing began in this country. It was promulgated by climbers and wilderness lovers who themselves had left safety anchors behind in order to experience wild places. The Act was written to prohibit "structures and installations", but these were clearly intended to refer to roads, motors, vehicles and aircraft- not bits of gear like a sling around a tree, or a cigarette-sized bolt in the rock. These possibilities were known to the authors of the Act, and yet they did not exclude them, because they knew that fixed anchors are an integral part of the "primitive, unconfined recreation" that the Act sought to preserve.

2) The proposed rule change represents an arbitrary, capricious reversal of a functioning policy. As a climber and wilderness lover, I have scrupulously adhered to the law. I believe in the Wilderness Act, and during all my exploration I have never brought a power drill (or a snowmobile, drone, motorcycle, OHV or any other motorized tool) into designated Wilderness. The law as written is an effective self-regulation. If you have ever spent the time to pound a 3-inch hole in a rock with a hammer and drill bit (try it sometime!), you know that the decision to place such an anchor is not made lightly. Every bolt I have ever placed has been the product of careful consideration. This is a solution in search of a problem.

3) The banning (or requirement of an MRA) for the placement or replacement of fixed hardware is a) unsafe and b) replaces personal, on-the-ground agency with an unwieldy, unfunded, and uninformed bureaucratic sledgehammer.

a) Self-reliance is a fundamental tenet of vertical exploration, and the ability of a climber or canyoneer to safely assess and adjust the security of life-sustaining equipment cannot reasonably be entrusted to a distant clipboard-holder with a lengthy backlog of other priorities, much less one who knows nothing of the activity in question. Placing obstacles in the way of updating critical hardware is going to get people killed, as the Park Service learned after the 2013 rockfall death of a park visitor in North Cascades who was forced to descend a dangerous gully because NPS removed the bolted rappel route that avoided that gully in favor of a cleaner path down a rock rib. Replacing of old, unsafe hardware must remain in the hands of users.

b) Requiring precise preapproval of every piece of fixed hardware on new routes is unreasonable, unenforceable, and will stifle the creative exploration encouraged by the Wilderness Act. It is simply not possible to foresee the necessity of each protection, belay, and/or rappel anchor on any route longer than one could throw a Frisbee. Any such preapproval process must be timely, allow for judgment on the spot, and not subject visitors to bureaucratic second-guessing or penalties. When I decided to climb a previously unvisited section of cliff in Yosemite Valley, I was pleasantly surprised at the number of bolts I didn't need to ascend 900' of new climbing on a blank-looking face. But any answer to some kind of new-route application question would have been a wild guess, and I wouldn't have wanted to feel like I had to take unnecessary risks in order to comply with that guess.

4) Quality fixed anchors prevent resource degradation. I used to climb in New England, where a staunch local prohibition on bolts forced climbers and descenders to trample fragile cliff-top ground cover in order to use trees for anchors. That ground cover is long gone, the treeline has retreated many yards from the barren cliff edge as roots were trampled, and now there's government-approved bolts along at least one of those cliff-lines anyway. How much resource degradation happens every time a SAR helicopter flies through wilderness to pluck someone whose crappy natural anchor failed?

5) Reversing a functional and long-standing policy will make enemies of Wilderness out of a generally supportive and engaged user group. Right now, I and people like me are fans of Wilderness. I use that hand drill, which is tedious, time-consuming and laborious because I believe in the Wilderness Act, and to me that means staying compliant with reasonable regulation. A potential ban on all fixed anchors is not reasonable regulation. I don't believe in motorized intrusions or ski lodges or highways through wilderness areas, but if this regulation goes into effect I will have a hard time supporting the creation of new Wilderness areas.

6) Adding these restrictions is an unfunded mandate that places even more burden on an underfunded agency. An MRA that takes months, years, or never to permit a vertically inclined wilderness visitor to attempt their vision will be (and should be) ignored. USFS resources are best applied to solving actual problems like maintaining existing trails or keeping snowmobiles out of Wilderness, not in hiking out to some remote crag to micromanage travel on what is most likely a highly durable surface with little appeal to hordes of people.

7) Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and highly contestable. This 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.

8) Defining fixed gear as an installation will make criminals of casual users. I couldn't get that cam out. We had to retreat in a thunderstorm and left a sling. The crack system on the new route ended and we had to swing over to the left off a nut. We had to rappel into the ski couloir because the top was iced up. The old anchor halfway down the canyon was swept away in a flash flood and we put a new one in. Are we now in violation of federal law? If this unenforceable policy is actually enforced, how much time and money will it take to process the newly defined criminals? Are there perhaps better uses of federal tax dollars than prosecuting climbers, ski mountaineers, and canyoneers?

9) Many formations, such as freestanding pinnacles and slot canyons are impossible to descend without leaving an anchor behind. Did these suddenly become illegal to visit? Because this is the practical effect of a fixed anchor ban.

10) Classifying fixed anchors as illegal will destroy a significant human heritage of achievement. Certain climbing routes arguably represent the pinnacle of human possibility, standing as evidence of boldness, athletic ability, creativity and vision. After the world heard of the Dawn Wall climb in Yosemite, many people came to see the place for themselves, like a shrine to perseverance and dedication. Others came to actually lay hands on the route and try it for themselves. That's just the one everyone's heard of. Multiply that by hundreds? thousands?,

if you're a climber or canyoneer, and you'll have an idea of the number of inspiring paths though wilderness made possible by the presence of fixed anchors. Defining these as 'installations' subject to removal will destroy these sources of inspiration for generations to come, for a benefit that this citizen sees as quite unclear.

In sum:

The Wilderness Act was never intended to prohibit fixed anchors, use of which long predated the Act and has nonetheless been subject to reasonable regulation ever since. Taking the responsibility for life-and-death, in-the-moment decision making out of the hands of a generally responsible user group and subjecting them to distant, uninformed, underfunded and overworked bureaucracy is a solution in search of a problem. It will create others, some potentially deadly. Fixed anchors are already subject to reasonable oversight. Flipping the script to 'presumed guilty' from 'permitted unless otherwise found inappropriate' is bad policy.