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Comments: As a climber and conservationist, I strongly urge you not to prohibit fixed anchors in American wilderness areas. Fixed anchors actually do more to preserve than to mar natural landscapes. Without them, climbers and other recreational users will be tempted to use trees and other features, which can be damaged and even killed with years of repeated wear. Secondly, while reasonable to regulate, it is unjust for the USFS to suddenly reverse decades of policies that have allowed, managed, and authorized fixed anchors. Finally, and most importantly, prohibiting fixed anchors introduces a huge safety risk 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 and any authorization process should not impede those decisions. Additionally, recall that search and rescue teams commonly use these anchors during training and missions to protect both themselves and those who are injured or stranded.

Fixed anchors are an essential piece of climbers' safety systems and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

Furthermore, 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.

Thank you for your time and consideration,
Jessica Mangun