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Comments: I am writing to oppose the proposed fixed anchor requirements and suggest improvements to the policy.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Existing climbing policies that allow judicious use of fixed anchors for more than a half century do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

Prohibiting fixed anchors will create safety hazards 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. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes. Additionally, in the absence of adequate fixed anchors, temporary anchors such as webbing and slings could be placed instead, leading to an accumulation of waste that is more harmful to the wilderness than fixed anchors.

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.