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First name: Matthew

Last name: Stephens

Organization:

Title:

Comments: I am deeply concerned with the recently issued draft climbing management guidance. If implemented, the guidance would create significant safety issues, threaten world-class climbing routes (many were established prior to wilderness designations), obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape. Furthermore the policy undermines the current democratic legislative process and movement by elected members of congress to protect and enshrine wilderness climbing in legislation. Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

This policy will directly impact the safety of climbers recreating in wilderness areas across the United States. Fixed anchors are an essential piece of climbers' safety system 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. Prohibiting fixed anchors will create safety issues 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, the House of Representatives and the Senate are moving forward legislation that would protect wilderness climbing and allow for judicious placement and replacement of fixed anchors. The House bill, the Protecting America's Rock Climbing Act, was packaged with a wide range of recreation and public lands bills to create the EXPLORE Act. A complementary package of recreation bills on the Senate side, the America's Outdoor Recreation Act, includes similar climbing provisions that would maintain the status quo for climbing in wilderness. Congressional intent is clear as the Congress has unanimously supported the climbing legislation and intends to stand behind climbers. There is a clear legislative direction and mandate that is currently being advanced right now in congress. At the very least, the National Park Service should wait for more clear legislative direction before implementing a policy that directly contradicts the will of congress and the American people. Passing this guidance policy, followed by legislation that would effectively repeal the guidance, would create immense confusion for climbers, land owners, and other recreationalists that threatens access and the ability to explore wilderness areas.

Please consider the very real safety impacts that this guidance would have on climbers and delay any decision on this policy until congress has the chance to implement its own guidance as is democratic process.