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First name: Frederica

Last name: Anon

Organization:

Title:

Comments: I am writing to encourage the US Forest Service to revise its proposed national climbing management guidance to protect the judicious use of fixed anchors in Wilderness areas.

Climbers are reliable and consistent in our respect of and conservation investments in the areas in which we climb. As climbing increases in popularity, protecting cultural and natural resources in the areas in which we climb must be an important part of our recreation activities. Maintaining the use of fixed anchors is not at odds with that goal. Furthermore, fixed anchors are an essential piece of climbers' safety systems, and prohibiting fixed anchors will create safety issues that may lead to an increase in rescues, which will place additional burden on already resource strapped forest service offices around the country.

Specifically:

1. 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.?
2. It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.?
3. 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.?
4. Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.?
5. 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.
6. 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.?

Climbing is not antagonistic to the legacy and mission of the Wilderness Act nor the USFS. Climbers can be allies in developing management policies that protect America's Wilderness areas, maintain America's climbing legacy, and keep people safe. Thank you.