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Comments: To lead with the most important part of my comment first, I object to restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands. This proposal 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.

I also object to new regulations regarding fixed anchors in designated USFS-managed wilderness areas. Prohibiting, or even more strongly regulating, fixed anchors will result in safety issues amongst the rock climbing user group. Furthermore, prohibiting fixed anchors jeopardizes rock climbing's history, and future, in America.

I've been rock climbing in America's public lands for nearly 30 years. Climbing has taken me to America's most beautiful, wild and amazing public lands and allowed me to experience these places on a level I never dreamt of as a kid. Specifically, my most rewarding and memorable experiences in American rock climbing have been the adventures where my partner and I explored the climbing opportunities on previously-unclimbed walls in USFS public lands. We saw a wall, found a way to reach the base and simply started climbing up the wall not knowing what lay ahead. While certainly intimidating, this kind of adventure is the top-tier of adventure in my mind. While making these first ascents of previously unclimbed walls, we utilized removable climbing protection as much as possible. However, in some instances, the only way to safely continue climbing up, or to safely descend, was to utilize fixed anchors. We use fixed anchors sparingly and, if drilling a small hole for a bolt and hanger was necessary, we used a hand drill to drill the hole for the bolt. These adventures, going from the ground and simply exploring upward, are spontaneous and without a plan-the makings of real adventure. If fixed anchors were to require pre-approval of some sort, or be confined to "existing climbing opportunities" we'd not be able to have these adventures.

I feel 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. 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.

Thank you for taking comments on this matter.

Sincerely,

Jason Halladay