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Comments: While I'm currently a Colorado resident, I grew up rock climbing in USFS Wilderness Areas from the Linville Gorge Wilderness in Pisgah National Forest in North Carolina to the Emigrant Wilderness in Stanislaus National Forest in California. Climbing in these and many other USFS Wilderness areas both predates the Wilderness Act of 1964 and depends on fixed anchors for the safety of users.

I is wholly appropriate to prohibit the use of mechanized power tools such as electric drills when using fixed anchors in Wilderness Areas. Prohibition of fixed anchors themselves, when installed using hand drills or other Wilderness compatible methods is inappropriate. Fixed anchors are the climbing equivalent of the water bars and switchbacks on hiking and equestrian trails. It is appropriate to build hiking trails in Wilderness with a Bobcat, but no one argues that hand cut trails with water bars violate the letter or spirit of the Wilderness Act. The same should be held true of appropriately installed fixed anchors on Wilderness climbing routes.

Additionally:

* 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.

* 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.

* 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.

* 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.

* 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.

* 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.