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First name: Anon

Last name: Anon

Organization:

Title:

Comments: The Southern Arizona climbing community has a long and positive history on National Forest system lands in the region

The Southern Arizona climbing community has been effectively collaborating with the Coronado National Forest for decades to improve forest lands and steward climbing areas via dozens of volunteer efforts including:

?System trail maintenance

Climbing area erosion control work

Litter cleanup

Graffiti removal

Fixed anchor maintenance

Raptor monitoring

NOTE: § A considerable amount of community resources has been committed to these collaborative stewardship efforts, including support from local businesses and non-climbing organizations

Rock climbing is a well-accepted and celebrated activity on the Coronado National Forest (CNF), with routes established well before the 1964 Wilderness Act. The CNF even celebrates rock climbing on its homepages as a major forest activity.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the 1964 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 route.

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, and support expeditious maintenance of fixed anchor.

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

The rule changes and development of the management plans come with no funding mechanism attached. The changes will place an unnecessary and unsustainable management burden upon the already short-staffed Forest Service.

?The US Forest Service should consider existing fixed anchors in and outside of wilderness to be approved and appropriate until such time that a resource analysis can be done to determine if each fixed anchor is inappropriate. Working with the local climbing community is essential in maintaining climber safety and promoting outdoor recreation