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Comments: I'm writing to provide feedback on agency responses/interpretations of the Wilderness Act and my profound concern for the policies being considered as it relates to climbing and fixed infrastructure. Before I begin I would like to state that I have been an active climber with more than half my life, 20 years now. I came to the activity now through a gym, or cragging, but as a way to explore wild spaces in a more technical manner than I could simply hiking and scrambling. Other than my wife, there is nothing I love more than climbing technical peaks in our wilderness areas. The policies being considered would threaten this activity that means so much to me and countless others, both residents of the US and worldwide.

I could write a short novel covering my concerns about the policies under consideration but will restrict my comments to a few fundamental issues of value in the broader discussion.

Problems with creating new guidance around anchors in wilderness climbing: Climbing in America's wilderness areas has a rich history dating back well over 100 years. For a significant portion of that time, technical climbing has occurred in these areas and with them tactics and equipment have evolved, and the sport has grown significantly. Although contentious at times, policy has evolved in a way that has allowed the sport to flourish. From a public policy perspective, I have significant concerns with current proposals that would fundamentally shift this relationship at this point. I cannot argue reasonably that fixed anchors are impact free: there are impacts from bolts or pitons and improperly managed slings and gear can be a source of pollution. However, there is a middle ground that allows for access by permitting anchor without administratively burdensome bureaucratic processes.

The fundamental policy issue here is, on the surface, about anchors. But it is ultimately about whether climbing is an acceptable use of public lands. If the answer is "no," then policies around anchors are irrelevant. If the answer is "yes, climbing is an acceptable use of public lands" then policies need to reflect the needs of that community. What's being proposed is, in my opinion, a policy that is highly restrictive of climbing activities on public lands disguised in other ways.

A change in policy that further restricts climbing activities by other means will be interpreted by the community as an attempt to restrict our use of public space. Recent access restrictions imposed by the NPS and USFS have already had that impact in many areas. Further movement in that direction is likely to further erode trust between these communities and agencies.

Climbing and safety: Climbers that have been climbers will continue climbing. Government agencies have choices to make that must balance safety and impact. There have been countless incidents in prior years that demonstrate how overly restrictive anchor policies have real impacts. Forbidden Peak in the North Cascades is a perfect example and one I am familiar with. A (fairly) recent accident on the peak resulted in a fatality that was likely avoidable if not for the NPS's restrictions on bolts (even if restricted to anchors) anchors in the area. The lack of bolts forced rappel anchors into an area exposed to rockfall, a contributing factor in the fatality.

Anchors and protection are critical to the safety of climbers. The proposed policies will decrease safety in our wilderness areas. Climbers will continue to use these spaces. Restricting the use of fixed anchors is more likely to cause more problems than it solves. Beyond safety issues, fixed anchors are likely to result in less impact on the environment. I have responsibly carried countless amounts of webbing and other equipment out from our wilderness areas. In most cases, fixed anchors would result in less distributed traffic resulting in less damage to sensitive fauna.

General impact: Are climbing anchors sufficiently impactful that restricting the use of fixed anchors is a critical issue to address? From a practical perspective, I find this difficult to understand. Roads, toilets, signage, bridges,

and trails are all more impactful than climbing anchors but considered a necessary part of providing access to wilderness areas. While climbing is not a necessary activity, one could easily make a similar argument about hiking and camping. A fair policy on wilderness anchors would reflect that different individuals have different preferences and that our spaces can actively manage these considerations. In short, it's difficult to comprehend how the development of access to many areas of parks can be viewed as acceptable while anchors are not. I also find it incomprehensible that dogs could be permitted (I pick up dog poop on almost every trip) or fires could be permitted yet climbing anchors do irreparable harm and must be managed in a way that will fundamentally restrict the sport.

Stewardship and advocacy: Learning to love the wilderness through climbing creates some of our best advocates for protection and wild spaces. I can personally attest to the fact that my positions in strong support of our wild, managed spaces are derived primarily from my history climbing and hiking (but climbing in particular). Policies that are adopted that restrict these activities will inherently limit the pool of individuals that develop a passion for and therefore work to protect these spaces. In short, it's my position that the structure of the proposed approach to protecting these areas will be counter productive over the long term.

I recognize that USFS is in difficult position trying to manage the impacts of climbing related activities on public lands. I wholeheartedly believe that it is in the best interest of government agencies to continue to allow the sport to be carried out on public lands and current proposals will have the opposite effect. Sound policies that promote safety and access to these spaces in a way that minimizing harm to levels far below those caused by other access issues. I believe the proposed fixed anchor restrictions are contrary to practices that are likely to be most successful in that regard and strongly encourage our public agencies to reconsider.

On re related note, restricting the establish of routes to existing climbing opportunities on non-wilderness land will further disrupt the communities that enjoy spending their time in the spaces. I believe USFS should continue to allow for new development and anchor installation on these lands with the exception of cases where the protection of cultural heritage or natural resources are critical.