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First name: Sarah

Last name: Leighton

Organization:

Title:

Comments: As currently proposed, the draft climbing management guidance would be a huge mistake. Speaking personally, rock climbing has led me to explore parts of this country - often NPS and USFS land - that I would never have otherwise seen, and in an up-close and personal way that has meant the world to me. As rock climbers my husband and I have endeavored to be respectful custodians and visitors to the wilderness, leaving no trace and respecting all local ordinances/closures.

The proposed guidelines would dramatically decrease safety of rock climbers, including my husband and I. Fixed anchors are an essential piece of the climbers' safety system - and require regular maintenance to remain safe. It is already challenging enough for local climbing organizations (often volunteer-run or non-profits) to keep up with maintenance needs without the added burden of red tape. Ultimately, these policies will endanger and alienate some of the biggest wilderness advocates in this country.

Below I echo the comments of the Access Fund, which I wholeheartedly support:

- 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.