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Comments: I write to request the your process around rock climbing fixed anchors be amended with the following feedback.

First, it should be noted that taking on management of fixed anchors creates a duty of care under tort law to maintain them and place them in such a way as to be free of liability. This the park or forest services cannot do in a manageable way and so regulating should be to the absolute minimum to avoid liability.

In addition, Fixed anchors are critical to climber safety and are not prohibited "installations" under the Wilderness Act, despite the draft document language that expresses a clear bias to traditional recreational use of the park or forest lands.

I urge leveraging existing climbing policies that allow judicious use of fixed anchors that have been in place for more than a half century because they will do more to protect the Wilderness character and also provide for primitive and unconfined Wilderness climbing.

It is patently 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.

Sincerely

Rob B