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Comments: The explosive growth of climbing as a sport creates new and difficult challenges for DOI agencies charged with managing land and recreational resources. We acknowledge the hard work ahead of land managers in the coming years as visits increase. However, the proposed climbing management guidance currently under consideration is misguided in several ways and we hope DOI will reconsider its proposed direction.

\*Adding unnecessary obstacles to the regular maintenance of fixed anchors will disincentivize essential maintenance and make climbing less accessible to the communities that DOI agencies are trying harder than ever to reach and engage.

\*Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Existing policies that have allowed judicious use of fixed anchors for more than a half century adequately protect Wilderness character.

\*Appropriate maintenance of fixed anchors by experienced climbers is essential to the safety of all wilderness visitors recreating on or near established routes.

\*New guidance policies prohibiting Wilderness climbing anchors across the country are unnecessary when they have allowed, managed, and authorized fixed anchors for decades.

\*Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. DOI agencies should 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.

\*USFS resources are already stretched far too thin, and should be focused on more essential management activities, not redirected to fix something that is not broken.

\*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.