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Comments: I appreciate that this proposal recognizes that climbing is an appropriate use on NSFS lands, but it is a mistake to determine that fixed anchors and fixed equipment are installations for purposes of section 4(c) of the Wilderness Act (16 U.S.C. 1133(c)). In fact, prohibiting or heavily restricting the placing and maintenance of fixed anchors runs counter to the proposal's recognition of climbing as an appropriate use. 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. Fixed anchors in Wilderness have been allowed, managed, and authorized for decades, and are an essential piece of climbing safety. Placing additional barriers to maintaining and replacing anchors when they become unsafe will create safety issues and lead to accidents. Some excellent and historic routes could be essentially erased by this proposal.

While exploring new climbing routes, it is sometimes necessary for climbers to make in-the-moment decisions to place fixed anchors. Oftentimes, these anchors are difficult or impossible for non-climbing users to see from the ground and so have little to no impact on the Wilderness experience of others. Furthermore, fixed anchors at rappels are often the lowest-impact way to descend from certain climbs, and especially single-pitch climbs- in the absence of fixed anchors the climber must either leave dangerous and unsightly slings behind to rappel, or walk off the descent in a way that is likely to create unnecessary social trails. Prohibiting fixed anchors will in fact increase the impact of Wilderness climbing.

If the USFS wants to keep track of fixed anchors and limit their impact on the Wilderness character of a given wilderness area, perhaps a more appropriate solution would be to leave in place the existing policies and instead require that anchor bolts be painted an inconspicuous color when possible, and that first ascent parties be required to register the number of fixed anchors placed on a route. The description of the proposed section FSM 2355.32, para. 1 indicates that the USFS plans on allocating resources to case-specific authorizations of fixed anchors. These same resource may be better allocated to evaluating fixed anchor placement after the first ascent party has reported the routes and anchors to the USFS and facilitating the approval of anchors (or removal of anchors if their placement is deemed inappropriate) in coordination with local climbing organizations and/or the first ascent party.