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Comments: Let's start with the fundamental statement from the proposed rule: "provide that climbing is an appropriate use of NFS lands ".

Most climbing requires the use of fixed anchors to safely descend (rappel) after the climb. Safe use of existing fixed anchors is only possible if each climber is free to assess the condition of the anchor and improve it prior to its use. Most use nylon slings that must be replaced every 3-5 years, due to solar and weather deterioration. Safety will be compromised if climbers are subject to legal risk for improving anchor safety.

Further, problems occur during climbing that force construction of temporary emergency escape anchors. Unless land managers want to increase their rate of rescues, climbers must not be subject to legal risk for constructing temporary escape anchors. Climbers should instead be strongly encouraged to report such constructions to land management, so that future climbers can voluntarily remove such temporary anchors, where their future need is unlikely.

The climbing community is a long-time partner with land management in maintaining our public lands. Polices should support and extend that partnership, not break it. Climbers are committed to maintaining the pristine character of wilderness, and are the best judges of when an anchor is not required and should be removed.