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Comments: I have been climbing since 1989. Over the years my climbing has evolved to be a spiritual pursuit that connects me with nature, helps me feel alive, and keeps me sane. Nearly all my climbing has been done on public land. Much of it occurs in the Boulder Ranger District of Roosevelt National Forest, where I am a volunteer Golden Eagle monitor. Many of my most profound climbing experiences have occurred in wilderness areas, particularly in Rocky Mountain National Park, where I am a VIP raptor monitor and VIP climbing ranger. I have personally benefitted from bolted rappel anchors in the park wilderness, specifically on the descent from The Sharktooth. I have also found myself in situations in the park wilderness where fixed anchors were not available or were of poor quality, and fixing a wired nut or two provided the only safe descent option. In those situations, being prohibited from creating or maintaining a fixed anchor would have led to very dangerous descents that could easily have resulted in serious injury or death. I have just read the draft policies to manage fixed anchors in wilderness areas by the Park Service and the Forest Service, along with the Park Service Director's Order #41 on wilderness stewardship. These three documents have content that both resonates with me and concerns me greatly. I hope you will use the following comments to improve future draft policies.

Regarding the Park Service Director's Order, it was great to see the official declaration that the "NPS recognizes that climbing is a legitimate and appropriate use of wilderness." I am a traditional rock climber committed to Leave No Trace ethics. I was encouraged to read that the NPS recognizes that "the use of removable anchors may reduce, but does not in every case completely eliminate, the need for fixed anchors. The occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act." I completely agree that "fixed anchors or fixed equipment should be rare in wilderness" and that "bolt-intensive face climbs are incompatible with wilderness preservation and management". And I fully agree that there should be processes in place where managers have the power to regulate fixed anchors and I have never questioned that power drills should not be used in wilderness.

Overall, I believe that the Director's Order provides excellent guidance on how climbing should be conducted and managed in a wilderness setting. In the years since this document was created, many cooperative relationships have formed between climbing organizations and land managers and these relationships have ensured that the character, enjoyment, and safety of wilderness climbing has been maintained, despite the enormous increase in participants. Sure, there are cases where rogue climbers have broken the law and used power drills to fix anchors in wilderness, but these are exceptions, not the rule. And there are cases where popular wilderness climbs have attracted heavy visitation, leading to resource damage. But these are problems associated with controlling the number of visitors, not the number of anchors.

Given the precedence set by the Director's Order, I was quite concerned when I read the draft policies to manage fixed anchors in wilderness areas by the Park Service and the Forest Service. While I applaud the attempt to provide guides for consistent management of climbing resources in wilderness, the policies outlined in the documents seem to deviate considerably from precedence - alarmingly so. The most alarming deviation was the decision to officially reclassify fixed anchors as prohibited installations. This goes directly against the Director's Order that states that the occasional placement of a fixed anchor by a rock climber does not violate the Wilderness Act. Further, senator Mark Udall from my home state of Colorado, who sponsored the bill to create the Rocky Mountain National Park Wilderness and expand the Indian Peaks Wilderness, stated in a recent opinion piece published online by The Hill that "nothing in those bills was intended to restrict sustainable and appropriate Wilderness climbing practices or prohibit the judicious and conditional placement of fixed anchors". Thus, redefining fixed anchors as prohibited installations directly contradicts the Director's Order and ignores the intent of the lawmakers responsible for designating wilderness in the first place.

Classifying fixed anchors as unlawful forces a process for evaluating and authorizing exceptions. The draft policies suggest that a Minimum Requirements Analysis (MRA) is the tool for this job. This suggestion is hard for me to understand. An MRA is a lengthy process employed when an agency decides that administration of a wilderness area requires new infrastructure: a road, a parking area, a restroom. It is difficult for me to envision how an MRA can be applied to a situation where a wilderness user is exploring wilderness using primitive traditional techniques and must make in-the-moment safety decisions regarding the necessity of a fixed anchor. Honestly, an MRA seems like an awkward solution that is being misapplied to fixed anchors. It is being misapplied to fixed anchors because fixed anchors are being inappropriately categorized as prohibited installations, and MRAs are commonly used to make exceptions for prohibited installations. One error begets another.

Another issue that argues against prohibition of fixed anchors and application of the MRA process is that resource managers are seldom expert climbers. Therefore, managers are seldom qualified to judge the value of wilderness climbing resources to the climbing community or the minimum requirements for safe climbing in wilderness. The draft policies encourage managers to reach out to local climbing communities for advice in this instance. When that happens, we come full circle. A manager must outlaw the use of fixed anchors - alienating climbers, jeopardizing their safety, and restricting climbing opportunities in wilderness - and then must return to those same climbers, who have been stripped of decision-making power, and ask them to help inform an MRA. Really?

It seems to me that the Director's Order provided excellent guidance for both Park Service and Forest Service managers on how to manage fixed anchors in a wilderness setting. This guidance and back and forth between managers and climbing organizations has landed us in a place where managers currently have sufficient authority and tools to manage fixed anchors and climbers have accepted responsibility for judicious placement and maintenance of fixed anchors in wilderness. But the new draft policies would seriously upset the current equilibrium. They would create a problem by reclassifying all fixed anchors as prohibited and then attempt to solve the problem with a cumbersome process that is inefficient at best, with the potential to be ill-informed and dangerous.

Park Service, Forest Service, please go back to the drawing board and return with draft policies that (1) respect the views of agency directors and lawmakers regarding climbing and fixed anchors in wilderness and (2) respect the cooperative solutions for managing wilderness climbing resources that have evolved over the years between managers and climbing organizations. This will require abandoning the decision to recategorize fixed anchors as prohibited installations and acknowledging that MRAs are not an appropriate or efficient mechanism for managing fixed anchors in wilderness.