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Comments: To whom it may concern,

I am writing in response to the draft policies governing the use and maintenance of fixed climbing anchors in wilderness areas. In my experience, the proposed policies will create dangerous conditions for climbers exploring wilderness without any meaningful benefit to the management of wilderness lands. Frequently, climbers return to the ground from summits by following another a line of anchors on a fixed descent route. It is rarely possible to determine the conditions of the anchors on the descent beforehand. It is also not always possible to complete climbs due to weather or route conditions and climbers must leave anchors in order to safely retreat. The new policy will put climbers in a position where they can not legally improve or improvise safe anchors during the descents or retreats from climbs.

Climbers have installed and maintained climbing and descent anchors in wilderness areas for decades without significantly impacting the wilderness experience of others. The new policy has the potential to limit new exploration, lose access to historically significant climbing, and put climbers lives at risk by creating a cumbersome and unnecessary bureaucratic process without earmarking funds to implement it.

The Access Fund has nicely summarized the many arguments for why the proposed policy is unacceptable.

*Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. 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.

*It is 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.

*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.

Please reconsider this policy,

Thanks,

Hampton Uzzelle