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Comments: I strongly oppose the proposed policy which recognizes fixed anchors for rock climbing as installations. Fixed anchors are not installations and should not require a minimum requirements analysis. Requiring a minimum requirements analysis for fixed anchors, current and future, is not only uncalled for, but also an impractical use of resources that could better be applied to conserving wild areas.

As an avid climber in all types of areas, including state parks, national parks, national forests, wilderness areas, and other public and private lands where climbing is permitted, I have seen the way that park and local regulations can work peacefully in tandem with climbers and climbing advocates.

A good example of this can be seen in Chimney Rock State Park, in Lake Lure, North Carolina, where climbers have partnered with park officials via the Carolina Climbers Coalition, which I am a member of, to build and maintain trails and pay for larger swaths of land which have been protected for the sake of climbing, hiking, and enjoyment for all users in a sustainable way in nature. This positive relationship between public land managers and climbers shows that collaboration in the right ways can lead to ensured and even improved conservation of wild places.

The National Forest Service's proposed policy for the evaluation of fixed anchors goes against this positive type of collaboration and will only result in the loss of trust of a major group of people, climbers, who are normally some of the first ones to advocate for and support the protection of wild places. As a climber, I strongly discourage this policy from going into action, as I believe it would result in not only tension between the National Forest Service and one of their historically supportive interest groups, climbers, but also, because I believe this policy would result in dangerous situations for climbers who unknowingly rely on fixed anchors which have been removed or disapproved, or simply have not made their way through the bureaucratic fixed anchor application and minimum requirements analysis.

There are already regulations in place that restrict the use of bolts in wilderness areas to only be placed with hand drills. This strongly discourages bolting, and ensures that bolts and fixed anchors are only placed when absolutely necessary. Bolt intensive face climbs are not the norm in wilderness areas due to this restriction, and most bolts and fixed anchors are the type that this proposed policy claims "does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act."

I am a traditional climber, who loves the adventure of clean climbing. In fact, I feel much satisfaction in completing a pitch without using any fixed anchors; however, the use of fixed anchors is required in several places simply for the sake of safety and escape. Prohibiting or more severely limiting the use of these types of anchors makes retreat and escape from adventure routes much more dangerous and technical, and in some places impossible and life-threatening. Therefore, climbers, trying their best to climb in a clean, traditional style, should not have to make the choice between breaking rules in order to stay safe and installing a fixed anchor without the required approval process.

Bolts are very small and unobtrusive. Rappel anchors, some of the most important fixed anchors for climbers, not only ensure safe escape from most trad routes, but they are invisible to those on the ground. They do not change or alter the face of the landscape, and certainly do so much less than installations like trails, signs, and fences. Most people who are not climbers do not even realize that there are bolts on cliff faces in wilderness area. In fact, when a tourist or hiker looks up at the walls of Linville Gorge or the Wind River Range and sees climbers, their reaction is always one of pleasant surprise. Having climbed in these places and heard these reactions, I have never once heard someone complain about seeing a climber on the side of one of these beautiful rock faces.

Even more unheard of is someone complaining about a bolt, piton, or rappel station, because these bolts, which are sparingly installed, are so hard to see, a nonclimber can hardly notice them, much less consider them a significant impact on wilderness character as other installations are.

In my opinion, based on over a decade of climbing all over the United States and all over the world, climbers are extremely conscious and thoughtful when self-regulating the amount of fixed anchors that are used in wilderness areas, national parks and other areas, because climbers as a whole care deeply for the conservation of wild places, and it is this desire to better know and understand these types of places that makes us want to climb in the first place. Limiting fixed anchors or qualifying them as installations which require a minimum requirements analysis only serves to prevent us as humans from better understanding the wild places we so dearly want to protect.

To go forward with this proposed policy is to criminalize the heroes and conservationists who used protected rock climbing as a means of better understanding and protecting America's beautiful landscape. These heroes include Royal Robbins, John Muir, Yvon Chouinard, Rick Reese, Doug Tompkins, and many more who worked tirelessly throughout their lives to protect and conserve wilderness areas and national parks. These pioneers of modern wilderness conservation pursued adventurous climbing, all of which required fixed anchors, in order to better know and connect with these wild places.

Not only is rock climbing with the use of fixed anchors a tradition that goes back farther than the creation of the wilderness act or even the national forest service, but the implementation of a minimum requirements analysis for every fixed anchor that currently exists in wilderness areas is simply beyond the scope of any agency, including the National Forest Service or National Parks Department. Financially and in terms of qualified personnel, it would be difficult and a waste of major resources to inventory and analyze the thousands of fixed anchors which exist in remote parts of the wilderness all over the United States.

The solution is to dispose of this proposal and support instead the PARC, Protect America's Rock Climbing Act, which will thoughtfully and rightfully recognize and protect rock climbing as an integral part of our history as Americans in the outdoors. Thoughtfully placed fixed anchors, especially those already requiring the use of a hand drill instead of a power drill, should be allowed without a bureaucratic approval process. Climbers have the right to protect themselves without submitting an application for analysis, especially when a forest supervisor may little comprehend the nature or importance of a specific fixed anchor request that he or she is evaluating.