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Comments: Dear US Forest Service,

I am writing to provide constructive comments on the proposed guidance regarding fixed anchors in Wilderness areas. Rather than opposing the proposals outright, I would like to suggest improvements to the guidance based on the following considerations:

#### Safety Considerations:

Fixed anchors are crucial for climbers' safety and have been an integral part of climbing practices for over half a century. It is important to recognize that fixed anchors are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors will better protect Wilderness character while accommodating primitive and unconfined Wilderness climbing.

#### Reasonableness of Prohibiting Fixed Anchors:

It is unreasonable for federal agencies to introduce new guidance policies prohibiting Wilderness climbing anchors nationwide. Federal agencies have historically allowed, managed, and authorized fixed anchors for decades. Implementing a blanket prohibition may create safety issues and hinder the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community.

#### Maintenance Challenges and Safety Decisions:

Prohibiting fixed anchors can create safety issues by imposing unnecessary obstacles to regular maintenance. Critical safety decisions often require in-the-moment actions, and any authorization process should not impede these decisions. Managing fixed anchor maintenance should incentivize safe replacements and not risk the removal of climbing routes.

#### Obstruction of Wilderness Exploration:

Prohibiting fixed anchors may obstruct appropriate exploration of Wilderness areas. Land managers should allow climbers to navigate complex vertical terrain with the flexibility to make necessary in-the-moment decisions. This approach will contribute to responsible exploration while preserving Wilderness character.

#### Preserving Climbing Legacy:

Prohibiting fixed anchors poses a threat to America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy should prioritize protecting existing routes from removal, ensuring the preservation of climbing history and achievements.

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.

I appreciate your consideration of these comments and encourage a collaborative approach that balances safety, preservation of Wilderness character, and the rich legacy of climbing in America.

Sincerely,

Lucas