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Comments: As a long-time wilderness manager and an agency leader of recreation and visitor service programs for both the BLM and NPS, I found the proposed Forest Service policy to be overly restrictive, lacking in clear implementation guidance, unnecessarily complex, and overtly weighted to encourage field managers to simply say no to any requests for MRA to be conducted for anchors on proposed new routes or to replace existing bolts or anchors. As currently drafted, this guidance will result in very inconsistent interpretation and implementation by field managers and line officers and will essentially prohibit access to public lands for safe climbing purposes.

The proposed guidance inconsistently defines "installations" for recreation access for all activities: USFS already has numerous recreation and visitor installations in designated wilderness and areas managed for wilderness character across the system, including trails, ladders, steps, handrails, signs, toilets, bridges, hitching rails, cabins, huts and much more to allow for safe and appropriate recreation access. Most of these installations are for visitor use and safety as well as resource protection, and most - I know from professional experience- did not have any MRA or assessment prior to their installation. There is significant inconsistency in how these "installations" are managed or approved. To hold climbing activities to a higher, unobtainable standard is inappropriate and unfair. Climbing anchors in these modern times can be managed with an appropriate assessment process to determine the need, density and location of anchors on proposed routes or as replacement safety installations on existing climbing routes.

Recommendations for draft policy enhancements:

Clarify and differentiate actions allowed in Congressionally designated wilderness versus non-designated areas administratively managed for wilderness character: The effect of this guidance will inappropriately extend management decisions beyond Congressionally designated wilderness areas. The draft guidance if implemented would restrict appropriate and sustainable recreation access on lands beyond officially designated wilderness as most of the acres managed by the USFS are not in designated wilderness but in lands managed administratively for a variety of purposes, use activities and protections. This guidance does not very well differentiate climbing policy management protocols between congressionally designated wilderness areas and how it would differ from other administrative designations. This differentiation should be clarified in a revised version of the guidance, with greater decision space in latitude for non-wilderness areas including national protected areas, special management areas, roadless areas or lands with wilderness character.

Inconsistent definition and interpretation of what constitutes an "installation" in wilderness: Agency solicitors may be over-reaching in their interpretation of an "installation". Fixed anchors are an essential piece of climbers' safety system and should not be summarily prohibited as "installations" under the Wilderness Act. Similar to trails, bridges, huts, signage and other "installations" for "traditional recreation access", climbing anchors offer safety and route finding to climbers. The new guidance should allow individual units, forests/districts or climbing areas to be assessed and evaluated for the type of experiences that are needed or should be provided for visitors that offer opportunities for use and enjoyment of parks and public lands including challenging recreation opportunities, allow for sustainable activities that minimize, mediate or eliminate use impacts, and maintain a reasonable level of access and safety for climbers.

Guidance should clarify and affirm the historic nature of climbing and recognize the appropriateness of existing climbing management policies that have evolved over the last century: The Forest Service should continue to use existing climbing policies that have allowed judicious use of fixed anchors for more than a half century. Such an approach would do more to protect Wilderness character over the long-term while providing for primitive and unconfined Wilderness or other area climbing. As a wilderness manager and leave no trace instructor, I recall

that some of the great wilderness advocates and conservation leaders including David Brower, John Muir, Bob Marshall, Olaus Murie and others all used and installed climbing anchors as safety equipment on their wilderness adventures. 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.

Proposed guidance overtly restricts opportunities to explore and visit forest service and public lands: As currently written, the proposed guidance would inadvertently restrict where the public is allowed to go without due legal processing of closures to public use. Prohibiting fixed anchors obstructs appropriate and sustainable exploration of Wilderness areas. Land managers should allow climbers, as they do the non-climbing public, to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex terrain or undertaking challenging activities or routes. If the agency needs or chooses to close a specific area to certain activities that they have determined and documented to be detrimental to resource condition or negatively effects natural or cultural resources - they may do so using existing emergency or other access closure processes and guidance.

Proposed guidance is inconsistent with the Forest Service's highest priority for visitor, volunteer and employee safety: Prohibiting fixed anchors will create unnecessary visitor risk and safety issues by imposing significant obstacles to the regular user-maintenance of fixed anchors, a responsibility often undertaken by the responsible climbing community. Critical safety decisions often must be made in the moment, in precarious situations or emergencies, and any authorization process should not impede those types of situational maintenance or repair/replacement decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe and sustainable anchor replacement and does not risk the removal of climbing routes. In addition, as currently written the guidance could inadvertently jeopardize the safety of agency staff, rangers, search and rescue personnel and others as well who respond to emergencies and often must utilize existing climbing anchors.

The proposed guidance should recognize the historic and traditional values of known and valued climbing resources: Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements and diminish opportunities for the future. Climbing management policy needs to clearly recognize and protect existing routes from removal while allowing for the managed maintenance or replacement of needed protection on existing routes and the reasonable development of new climbing opportunities as the sport and technologies evolve.

The proposed guidance should include descriptions of assessment processes for area-wide determinations or use of categorical exclusions for certain areas, density of routes or anchor placement or maintenance: The proposed policy does not address how rules could be applied to cover larger zones or areas or delineate circumstances where MRA analysis could be conducted on an area-wide basis. Guidance should allow for managers to make MRA determinations for a specific area, management zone or individual wall or outcropping rather than an onerous route by route or bolt by bolt evaluation. Guidance should also include how forests or units could use and implement a categorical exclusion for bolt installation, maintenance or replacement as the agency does for roads, trails, signs and other "installations" in wilderness for public access. To allow certain types of clearly defined uses, practices or improvements in defined areas helps in the streamlining the administrative burden, improves responsive management, and is cost efficient. Forests do this for trails, signs, trailheads, rest rooms, and other infrastructure or installations designed for visitor use, transportation or travel. The draft guidance does not provide clear definitions or offer key considerations or an example decision tree or matrix for managers to follow in determining factors and terms like "bolt intensive", "appropriate recreation" etc. Such additional guidance would help provide consistency in the application of the policy between forests, agencies or continuous changes in individual managers or rangers.

The proposed guidance may be unenforceable as currently written: Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is essentially unenforceable. It reflects an

inappropriate pre-determined decision on land-uses and will create significant confusion among both land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for identification of new routes, reasonable placement and density of new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Please withhold my personally identifiable information from public review. Thank you for the opportunity to comment on this rule change.