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First name: Jonathan Last name: Carter Organization:

Title:

Comments: Dear United States Forest Service,

I am writing to address the proposed policy change on fixed anchors in Wilderness areas. Fixed anchors are a vital part of safety in climbing and are not prohibited "installations" under the Wilderness Act. Federal agencies have allowed and managed fixed anchors for decades, and it is unnecessary for these agencies to create new guidance policies prohibiting Wilderness climbing anchors. Prohibiting fixed anchors will create unnecessary barriers to the needed regular upkeep of existing fixed anchors, which will create a serious safety hazard on agency land. Fixed anchor maintenance should be managed to incentivize safe anchor replacement and allow for the critical safety decisions that must often be made in the moment without the impediment of a costly and inevitably backlogged authorization process. The vertical terrain is complex and requires climbers to make immediate decisions that impact safety, and prohibiting fixed anchors would thus obstruct appropriate exploration of Wilderness areas. Additionally, climbing management policy on USFS land needs to protect existing routes from removal as doing so would threaten America's rich climbing legacy and erase some of the world's greatest climbing achievements. Finally, restricting the development of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will introduce confusion between land managers and climbers. Climbing management policy in non-Wilderness areas should maintain opportunities for new anchors unless and until proper analyses conclude that climbing should be restricted to protect natural and cultural resources. Thank you for your consideration of this input and I hope you will implement these points as improvements to your guidance on fixed anchor use in Wilderness areas.

Sincerely,

Jonathan Carter Knoxville, Tennessee