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Comments: I can not imagine a more poorly thought out, unnecessary and counter-productive procedures than what is being proposed by the the U.S. Forest Service for managing fixed anchors in USFS.

As you are aware, as proposed, fixed anchors cover anything from a bit of sling or hardware left behind to facilitate the only safe descent from a summit to a bolt and hanger used to protect a rock face without any natural protection available. Also, because of how USFS boundaries have been drawn, rock formations that are literally less than two minutes from a road and remote peaks that may take days to reach are treated in the same manner by this heavy handed and one-size fits all proposal.

Similarly, remote climbs that have only an occasional piece of fixed protect to ensure a minimum level of safety, and massive climbs on popular front country formations are treated identically. This clumsy approach appears less a plan to manage climbing, potential impacts, or even address a specific problem, than a calculated attempt to ban thoughtful and safe climbing practices.

Climbing and the use of fixed anchors in USFS lands, including USFS Wilderness areas long pre-dates the 1964 Wilderness Act. Climbers were major proponents in the creation and passage of the Wilderness Act and have long been some of the strongest supporters of preservation of our wild areas. The USFS now proposes to change its interpretation of the Wilderness Act and alienate this partnership.

The proposal presents a potentially existential safety hazard. The policy to restrict or prohibit the placement or replacement of fixed anchors unless specifically authorized through a Minimum Requirements Analysis (MRA) removes personal safety decisions away from climbers. The MRA requirement for fixed anchor replacement will result in unsafe conditions because timely, routine fixed anchor maintenance would be obstructed or prohibited.

Traditionally, land managers do not maintain fixed anchors, whereas climbers are responsible for assessing and replacing fixed anchors during climbing activities. As such, climbers take the responsibility for making life and death decisions regarding safety. By taking on this safety responsibility, and removing the ability of climbers to ensure their own safety, undoubtedly, as years pass, climbers will be injured and die. And, the USFS will open itself up to liability for these injuries and deaths under exiting Federal Case Law.

It is no exaggeration to state that the many individual USFS units lack the resources, funding and/or knowledgeable personnel to implement or follow through on this proposal in any meaningful or timely way.

The impacts that fixed anchors impose upon the USFS lands are insignificant and amount to a tiny fraction of the impact of even the shortest section of maintained trail. To the extent that there are a few rock formations with fixed anchors that, through their intense popularity, have created associated impacts, these should and can be addressed on a case by case basis under existing regulations and management policies.

And, presumably, I can still drive my ATV across the landscape, cut down a Christmas tree and engage in other tremendously impactful activities on USFS lands, but won't be able to place or replace a fixed anchor that has no discernible impact.