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Comments: I am writing to register my strenuous opposition to the draft Forest Service policy on prohibiting fixed climbing anchors.

I have been exploring alpine terrain in the North Cascades for over 20 years, having moved to Washington for graduate school. Over that time, I have progressed from hiking and scrambling to alpine rock objectives and, over that time, my appreciation for the wild character of Washington's mountains, particularly those in our many wilderness areas, has only deepened.

The fundamental problem with the proposed policy is that, by default, fixed anchors, including existing fixed anchors, are prohibited, absent approval through a multi-step process. Because this process, particularly establishing a Climbing Management Plan, will be involved and subject to availability of funding and resources over a multi-year period, this sets the default position that no new fixed anchors could be established, nor could existing fixed anchors be maintained. The latter is particularly problematic because it puts climbers at significant, unnecessary risk on established routes. As a rule, climbers do not place fixed anchors if other options are possible or preferable. In general, a climber who places a bolt or piton where natural protection exists will find this fixed protection rapidly removed and themselves subject to the ire of the community. At the same time, descent of a technical route is impractical without rappel from a fixed anchor (bolts, pitons, or slings around natural features). In cases where I am aware that bolts have been used for rappel anchors in place of slings, this has been done to reduce the climbing footprint from "nests" of slings that can damage slow-growing trees.

The proposed rule also uses subjective language to determine when fixed anchors are "necessary". If an elite (or young, bold) climber free solos a route, does that mean that a rope is no longer "necessary" for ascent? I would argue that the answer to this hypothetical is an unambiguous "no", but this is my subjective opinion. I see answering this question for each fixed anchor on a route to require a similarly subjective ruling on what constitutes necessity. How far should a lead climber be willing to fall if natural protection is unavailable and existing fixed anchors have degraded from their initial placement? How technical must terrain be before climbers must switch from downclimbing to rappelling, which always requires a fixed anchor of some type? These questions do not have accepted answers, even within the climbing community.

In addition, I question how this policy could be meaningfully enforced. Does it require rangers to cite climbers using fixed sling anchors to descend a route on rappel? This is likely impractical, so does it require climbing rangers to routinely descend routes, removing all fixed slings as they go, and placing themselves at significant personal risk? Practically, enforcement would focus on those routes with the highest traffic, which are often the routes where many of us had our first climbing experiences. Policy enforcement that disproportionately impacts novice climbers would be highly inequitable.

I draw a parallel between fixed climbing anchors and other "improvements" within wilderness areas, such as trails and bridges. Would it be possible for us to traverse a wilderness without trails? Yes, but this would be slow going, less safe, and do significantly more ecological damage to natural vegetation. Would it be possible to cross rivers within wilderness without a bridge? Yes, but depending on the river and time of year, this could be quite unsafe.

The intention behind the policy is reasonable. Unregulated development of bolted ascent routes within wilderness areas overseen by the Forest Service is not an acceptable status quo. However, given that climbing is an accepted activity within National Forests, some degree of fixed anchors is required for safe ascent in otherwise blank terrain and for safe descent, which encompasses the timeliness of that descent. Consequently, if this policy applied only to new, primarily bolted route development in wilderness areas, I would be supportive. However,

absent a three-stage administrative approval with uncertain funding and timelines, a blanket prohibition on all existing and new fixed anchors is unacceptable and farcical. I oppose adoption of this policy in the strongest terms.

Conversations between climbers and land managers are important, but requires nuance that cannot be found in a blanket, national policy.