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Comments: As a climber of 20 years, I have traveled extensively throughout the western US and climbed in many national forests, often in designated Wilderness. The proposed policy changes to climbing management in Forest Service managed Wilderness zones is deeply concerning for many reasons. Foremost, it directly opposes Wilderness climbing management that has existed since the passage of the Wilderness Act, in deeming fixed anchors "installations" and severely restricting their future use. Fixed anchors of all manner have been utilized judiciously and in limited capacity by climbers in Wilderness since before the Wilderness Act was passed, and continue to be crucial for allowing climbing to occur on these public lands. The use of fixed anchors has always had restrictions to non-motorized placement (specific to bolts) to be compatible with the provisions of the Wilderness designation. Climbers have always been the responsible agents for maintaining or updating existing fixed anchors to ensure safety and reduce potential accidents/fatalities that could occur if these anchors are not routinely inspected and replaced. Very few of America's Wilderness rock climbs could safely be ascended and descended without fixed anchors, placed by climbers and maintained by climbers. The current proposal if taken to the full extent of its measures could effectively end safe Wilderness climbing opportunity for a large portion of the existing routes within Wilderness. It also will severely restrict any future exploration of our public lands by climbers.

Implementation and enforcement of these proposed changes seems completely out of the realistic scope of Forest Service management in many of the parks with designated Wilderness climbing. Safety of citizens attempting to recreate in their public lands, as they have for decades under the currently existing Wilderness management, will become a major issue. Fixed anchors are necessary on the vast majority of routes they currently exist, and the ability to maintain them appropriately is crucial for continued safety. Liability for anchor related failures does not currently fall upon governing agencies, but restriction of fixed anchors for safe ascent/descent and maintenance of existing anchors places this liability for safety squarely upon the agency. Evaluation of all existing fixed anchors and of potential future fixed anchors is also not realistically within the scope of Forest Service management in most national forests. By definition, these routes often lie in wild settings, and will not be easily accessed or assessed by Forest Service personnel. This new proposal places significant burden upon the agencies managing these lands, and historically, such oversight is not practically feasible for the agency. Funding and staffing are simply not adequate to impose such undue management burden upon already overstressed agencies that have many complex user concerns to continually address.

Please, keep America's Wilderness climbing wild, safe, and viable for the millions of citizens that recreate annually on these public lands and the future of climbing as an activity that can occur within the Wilderness!