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First name: Kevin

Last name: Hoffman

Organization:

Title:

Comments: To whom it may concern:

As a professional guide with AMGA Certification and nearly a decade of experience managing and obtaining public lands permits for recreational university climbing programs, I oppose adoption of the draft Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas. I would personally emphasize that a prohibition of fixed anchors will indeed cause safety concerns and the likelihood of costly rescues in wilderness terrain. I foresee this when retreat due to circumstances like weather or accidents are complicated by not having the best or updated fixed anchors or "installations" available as a resource when needed. Regular maintenance is most commonly a responsibility undertaken by the climbing community and in my experience this has proven to be an efficient way of updating fixed anchors as needed. I fear that the MRA process will cause bureaucratic delays in the proper maintenance of the fixed anchors or "installations" that are deemed critical for public access to historically accessed routes. I'm in agreement with the Access Fund's assessment including the following arguments against the draft proposal.

-Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

-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.

-Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

-Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

-Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

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Thank you,

Kevin Hoffman

AMGA Multi-Pitch Instructor