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Comments: NFS,

As an archaeologist and a climber, I feel that I am uniquely situated to comment on this proposal. After reviewing it, I am generally pleased with the efforts taken to develop it and bring it forward. I have seen a great stir on social media caused by this proposal as well as its equivalent for the NPS. It seems that many have not read it and that only a few of those who have actually managed to understand it. With that said, I would like to address some of the main concerns raised already, as well as my own.

I am sure the NFS has received many copied and pasted responses from the Access Fund statements. I've included them below and commented on each individually for convenience:

"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."

I agree that fixed anchors are essential for the safety of climbers, SAR members, NPS/NFS staff, and others in many situations. I can also see why they would be classified as prohibited installations. However, I also see them as extremely beneficial to the management of wilderness when properly considered in the management plan for the wilderness.

"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."

On the contrary, it is the nature of policy that changes be made in accordance with changes in values, technology, and other factors as needed. The proposed change does not outlaw fixed anchors, but instead tries to manage them appropriately just as other activities are managed to maintain the ideals of wilderness areas and public enjoyment.

"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."

The proposed changes do not restrict emergency or in-the-moment decision-making concerning fixed anchors for safety and expeditious descent. The crux of the issue here is that the federal government is finally realizing it is a good idea to maintain some degree of oversight for fixed anchors as they are on public land and are necessary for the safety of numerous groups. It does not make sense to allow the climbing community to function as some kind of unsanctioned overlord of all fixed anchors and bolts on public land. Moreover, perhaps there are routes on public lands that presently jeopardize cultural or natural resources, safety, etc in some way. The presence of bolts currently does not automatically mean that these routes should be permitted to remain for eternity. Of course, this is likely a rare scenario, but one the climbing community must come to terms with.

"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."

The language of the proposal does indeed seem to allow for this, though the issue may crop up with the requirement of prior approval on an area-by-area basis "as funding allows". More on this later.

"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."

Again, this seems to be a misinterpretation of the proposal. The goal of this proposal does not appear to be related to removing many climbing routes. Indeed, there are no funds even allocated for dealing with proposals for replacing hardware or installing new hardware. These activities are still to be undertaken by those who propose bolting or rebolting routes.

"Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources."

It makes sense to allow land managers to allow new bolting as it makes sense for that area. Even if an area has not been surveyed recently or ever for cultural/natural resources, land managers will have an idea of whether or not climbing should be restricted. I do not see climbers as being trained in recognizing the damage they might be doing to cultural or natural resources in many cases.

My issue with this proposal for managing fixed anchors and equipment is that no additional funds are allocated to deal with the additional obligations being imposed on local land managers as well as the climbing community. In this way, this proposal reminds me of NAGPRA. There will only be more issues down the road with this proposal if resources are not allocated to help the NFS deal with these new requirements. Perhaps it could also be helpful to hire experts in climbing/rope access/SAR to consult on what would constitute current best practices in terms of hardware in particular areas. I see this policy as being particularly tricky to implement in more unknown or undeveloped areas.