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Comments: I am writing in response to the recently drafted climbing management policies proposed for National Parks.

Here are some arguments from the AccessFund, that I wholeheartedly agree with, that are opposing the draft's position:

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.

All of the above is true, but what I am really concerned about is that the drafted policies could threaten technical rock climbing altogether! Fixed anchors are an integral part of technical climbing, because they are (frequently) used not only for belay anchors for upwards progress, but also used as rappel anchors for downwards escape. Without them, most rock climbing routes would not be safe, and therefore, not doable either upwards nor downwards. So much like prohibiting trails would effectively make hiking an impossibility for most hikers, likewise prohibiting (new or replaced) fixed anchors would effectively make rock climbing (and rappelling) impossible for climbers.

99.9% of us climbers have never created or replaced fixed anchors, but instead, we rely on some super-experts out there that do this for the safety of those that follow. I have been climbing regularly for 40 years at a somewhat "expert level", and I've never placed nor replaced anchors, but I have used them almost every time I have gone climbing. Without anchors, I would only have been able to go climbing once, since I likely would have perished on that first route. In addition, the vast majority of climbers are a conservative community and have tremendous respect for the outdoors (that's why we're there in the first place!). Those super-experts that create and replace fixed anchors do so with their own self-scrutinizing eye, making sure they only perform such actions if absolutely necessary.

Instead of an outright ban on fixed anchors, other processes could be used to establish rules for fixed anchors instead. For example, currently the City of Boulder, Colorado, Open-Space Mountain Parks uses an application-based process for the creation and replacement of fixed anchors, where each application is reviewed by a committee of experts. Apart from emergencies (where replacement may have to be done immediately for safety), maybe a similar process could be adopted.

Passing legislation to prohibit new or replacement of fixed anchors would unfairly restrict, if not eliminate, rock

climbing. If the idea is to eliminate the eye-sore (which is nearly zero) or human manufactured things in the wilderness, then we should also eliminate those that are created for other pastimes. It's simply not fair to build infrastructure (e.g., trails, signs, etc) to support one activity but disallow infrastructure (e.g., tiny camouflaged bolts) for another.