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Comments: Thank you for inviting comment on the Fixed Anchors and Equipment proposal. I am both a climber and a wilderness advocate - financially I support both via donations to the Access Fund and Wilderness Land Trust organizations. While I support the idea that wilderness should be regulated in keeping with the Act to ensure that wild spaces are preserved for current and future generations, I am concerned by scope and intention of the proposal.

Certainly not every fixed climbing anchor or bolt is necessary to reasonably achieve a climb, but climbers do depend on a reasonable degree of autonomy in these decisions to stay safe while exploring wilderness areas. In my view, the existing arrangement in which climbing anchors are tolerated in wilderness areas provided they are not installed using power equipment seems to walk the line between safety use and resource protection nicely. Additionally, the climbing community has made strides to better self-organize and self-regulate in the past decade or two as awareness as grown of the impacts of increasing numbers of climbers going to sensitive areas.

By making all existing anchors subject to review, the administrative burden to support a relatively small community seems to explode overnight. I see three possible outcomes:

1. Reviews are done in a way to authorize (or prohibit) use across broad swathes of land. For example, perhaps all of the Black Wall on Mt. Evans is authorized in a single review. This would be simple but seemingly runs counter to the objectives of the proposal.
2. Significant resources are devoted to analyzing climbing anchors in a timely manner. Given the funding limitations of the USFS, this doesn't seem likely, but if it did happen I would worry about what other mission-critical work would suffer for lack of attention.
3. Given lack of funds, reviews are not done in a timely manner. Existing anchors deteriorate to the point that enough are safety hazards to motivate a complete climbing ban in areas. While climbers are a small use group, this group would likely then become hostile to Wilderness preservation rather than allies.

Here in Boulder, we have a review process for new bolts in popular climbing areas like Eldorado Canyon and the Flatirons. I generally like this approach, but I don't think a one-size-fits-all works, because many areas do not have the resources to devote to climbing that Boulder does.

My hope is that the proposed changes are evaluated (and revised accordingly) to recognize the legacy that climbing has in the American wilderness, and understand the potential negative implications on safety that an onerous review process could create. Specifically:

Local/regional land managers should work with climbing organizations to ensure that the activity is done sustainably (e.g., review access and descent trails, which are likely much more impactful to the wilderness, and make seasonal accommodations for potentially impacted wildlife).

If fixed anchors must be subjected to a review process, that process should be transparent and timely, and existing anchors should be allowed to be updated while the review is ongoing in the name of climber safety.

Thanks again for the opportunity to review this proposal. My appreciation and support of the wilderness has grown from great experiences climbing on Longs Peak and the continental divide mountains of Rocky Mountain National Park, as well as cragging in Joshua Tree. Some of these experiences would not have been possible

without thoughtfully placed fixed anchors, or at the very least the experience would be considerably more dangerous.