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Comments: Good Morning USFS Team,

I am writing with regard to the proposed rule changes for climbing on USFS lands to express my disagreement and disappointment with the lack of foresight and understanding of the issue contained therein.

To wit, fixed anchors are an absolutely essential piece of safety gear, needed to ensure safe and responsible climbing on rock faces. Each anchor is a small piece of equipment, and most certainly does not meet the definition of an "installation" as prohibited under the Wilderness Act. If the NPS will continue to follow existing climbing policies that allow judicious use of fixed anchors, as it has for most of the last 100 years, this will do more to protect Wilderness character while at the same time providing continued opportunities for legal and safe wilderness climbing. As an Air Force Civil & Environmental Engineer, I have seen firsthand how our government processes, however well intentioned, create major inefficiencies in basic structural maintenance of facilities. Please don't put those inefficiencies into the life-or-death maintenance and placement decisions of climbers. Bolts and climbing anchors DO NOT meet the definition of a facility, and should not be treated as such. Doing so will add entirely too much headache and strain on resources of forestry personnel, in addition to the negative impact on the climbing community.

Additionally, it is illogical for federal agencies to create new guidance policies prohibiting wilderness climbing anchors across the country, when said anchors have been safely allowed, managed, and authorized for the past few decades.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of currently existing fixed anchors. Inspecting and maintaining these essential pieces of equipment is a responsibility that has thus far been undertaken by the climbing community. This is because critical safety decisions often must be made in the moment. Any bureaucratic authorization process will impede those decisions, putting climbers and bystanders at greater risk, and adding unnecessary financial and paperwork loads to your agency. Fixed anchor maintenance needs to be managed in a way that avoids increasing hazards in established routes by incentivizing safe anchor replacement, rather than encouraging unsafe climbing and/or removal of existing routes.

Prohibiting the placement, maintenance and adjustment of fixed anchors directly restricts and damages America's rich climbing legacy, and threatens to erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal, and allow for their continued, bureaucracy-free maintenance.

By prohibiting fixed anchors, the USFS would directly obstruct appropriate exploration of Wilderness areas. Land managers need to be able to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain, rather than needlessly worrying about whether allowing a climber to utilize industry standard safety equipment might negatively impact their performance rating or job security.

As a final point of consideration, if the USFS restricts the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands, they will be creating a rule that is unenforceable and that will undoubtedly create confusion amongst both land managers and climbers, and lead to conflict, unnecessary paperwork, and sadness. 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. The climbing community tends to aid in locating & protecting these resources, and should therefore be encouraged to explore unknown areas and report findings as they are made.