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Comments: As a long-time traditional climber, wilderness enthusiast/advocate, outdoor educator, and retired Leave No Trace Master Trainer, I want to express my opposition to the proposed new USFS guidelines/restrictions for fixed climbing anchors in designated Wilderness Areas and additionally to guidelines to restrict new routes in non-Wilderness areas. Fixed anchors (including slings, pitons, and other safety equipment, in addition to prudent use of bolts) are an essential piece of climbers' safety system and should not be reclassified as prohibited "installations" under the Wilderness Act. Doing so would not only go against long standing policies and practices-including many that predate the Wilderness Act-but would also seriously jeopardize the safety of climbers. Fixed anchors need to be managed in a way that incentivizes safe anchor maintenance and does not threaten America's rich climbing legacy by removing climbing routes, preventing the exploratory creation of new routes, or hindering safe descents. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Moreover, subjecting fixed anchors review and permit processes would cause substantial additional burden on land management staff, particularly for less well-resourced areas.

For non-Wilderness lands, restricting the establishment of new routes to "existing climbing opportunities" 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. Notably, any areas without a climbing management plan should default to enabling fixed anchor maintenance and fixed anchor use in new route establishment.

A favorite experience as an outdoor educator, is watching others experience the awe as they begin to grasp a richer and deeper understanding of the natural world. Climbing in Wilderness and other USFS-managed natural areas, often enabled by fixed anchors, provides one of the most effective ways of fostering this deeper connection. The resulting impact of greater numbers of people who respect and protect both wilderness areas and the greater natural world is critical to maintaining our planet for generations to come. As such, I do respect and strongly advocate for the responsible use of Wilderness areas and other USFS lands, while also firmly believing that fixed anchors can be a component of a sustainable Wilderness experience. Following existing climbing policies that allow judicious use of fixed anchors will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. Please revise your climbing guidance to reflect the practice and precedent of the last 60+ years-that fixed anchors for climbing can be used, replaced, and maintained in designated Wilderness areas and that climbing and fixed anchors in non-Wilderness areas should only be limited when analyses shows that climbing should be restricted to protect cultural and natural resources.