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Comments: As a climber, I understand the need for guidance regarding fixed anchors on public land, especially wilderness. However, the proposed guidance strikes me as incompatible with safe and responsible climbing. While theoretically, fixed anchors can be approved via the MRA process, this seems totally untenable given the quantity of existing climbing routes, leading to a de-facto ban on fixed anchors.

Fixed anchors need to be permitted for safe ground-up exploration. Climbers seeking to establish new routes cannot predict the exact nature of the rock prior to climbing it. For many routes, a certain amount of fixed anchors are required to safely climb it. There are certain areas and routes which can be safely climbed without a single piece of fixed protection, but these are a minority.

The usage of fixed anchors typically reduces human impact on wilderness areas, when compared to the alternatives. When descending from a route, rappelling will cause little or no additional impact to the area, while a separate descent route (a "walk-off") will likely cause significant additional erosion and rockfall, while also being more dangerous. Even the usage of natural protection doesn't always mitigate impact; the long-term use of removable protection can still scar the rock and damage trees.

If climbing is indeed an acceptable use of wilderness, then it must be recognized that fixed anchors are an essential part of the activity.