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Comments: Thank you for the opportunity to comment on the newly proposed guidance on managing fixed anchors in Wilderness.

As a wilderness advocate and influential member of the climbing community my goal with this comment is to help build guidance that fosters a culture of Wilderness protection amongst climbers. I have likely spent more time climbing (And establishing first ascents) in Wilderness than just about anyone. I therefore have a deep knowledge of the nuances and impacts of fixed anchors..

When considering this proposal I think we should continually ask ourselves what the best path towards protection of our Wilderness is. The Wilderness Act is a wonderful piece of legislation that has done so much good. But in many ways it is vague and open to interpretation. So we must interpretate in ways that fit the times. We are living in a age where Wilderness is threatened by many things. Fixed anchors being the least of our concerns. We must hold climbers to a high standards of restraint, but not turn them against Wilderness protections. When guided properly, climbers have been, and can continue to be great voices for protection

While I am aligned with the intent of the proposed guidance, I have concerns about some of the details. I advocate for a revised proposal that clearly protects Wilderness; that more appropriately defines what fixed anchors are; and honors the capacities and needs of different land management agencies. For this management plan to work, I believe we need a pragmatic approach that not only sets guidelines. But also inspires the climbing community to follow them.

Using the MRA process manage fixed anchors could be a degradation of the Wilderness act.

While I support finding a solution that encourages climbers to go through some kind of approval process for placement of additional fixed anchors. I don't think using MRA is proper approach. MRA would place too big of a burden on the agencies, and may actually degrade the Wilderness Act. I believe the MRA process is intended for administrators only and should not be opened to the public.

Interoperating fixed anchors as "fundamentally prohibited Installations" Is problematic.

Fixed anchors have been a critical tool to climbers since far before the Wilderness Act was established. And climbing was widely practiced within many of our wilderness ares long before they were designated Wilderness. For example, my home of Rocky Mountain National park was only designated wilderness in 2011. I personally have been climbing and using fixed there since 1981. I believe that our dilemma today lies in the increasingly narrow definition of "installations". I am not confident that fixed anchors were intended to be managed as installations original drafting of the wilderness act. And I don't think its beneficial to Wilderness protection to consider them as such today. Climbers played a role in establishing the Wilderness Act in the first place and have been advocates for the expansion of Wilderness Protections ever since.

De Minimus framework.

I disagree with the following wording in the draft plan. "Although fixed anchors may be small, there is no 'de minimis' exception to the Wilderness Act's restriction on installations." Nor need there be for this principle to apply. De minimis refers to something too small or trifling for the law to notice; there does not need to be an

exception written into the law for it to apply.

As someone that has spent a large percentage of my life in wilderness, I know there to be a lot of things in wilderness that could technically be considered "prohibited" if you chose to take the strictest interpretation of the policies. Skis, rafts, Cell phones, cameras, GPS units, trail markers, fixed anchors, ect. Although imperfect, I believe the De Minimus framework has been the way to manage these things historically and I believe this continues to be our most practical path moving forward. This also gives autonomy to the agencies to make specific decisions about existing and future fixed anchors based on the context and needs of the Wilderness areas they manage. Yosemite is different from the North cascades and De minimus can offer the agencies the opportunity to interpret differently in each place.

#### An Effective Guidance

Directors Order 41 came out of a yearslong collaboration between government agencies, recreationists and conservationists. We fully recognize the need for more concrete guidance on how to administer DO41, and believe that guidance can be achieved through a similar collaboration using the judicious application of the "de minimis" framework per each Park and Forest Services' unique understanding of the Wilderness lands they manage.

We see the Wilderness Act as a powerful tool for land protection. One thing that is true across all Wilderness areas is that fixed anchors should be used only out of necessity in Wilderness, not comfort, to preserve both the experience of the adventure and the wilderness character of the landscape. Climbers and Wilderness stewards need a management process for fixed anchors that more appropriately defines what fixed anchors are and that clearly protects Wilderness, honoring the capacities and needs of different land management agencies.

Thank you for the work you do to protect and preserve our precious Wilderness areas. We look forward to an updated guidance that extends that work sustainably and effectively.