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## Title:

Comments: A comprehensive climbing management plan is critical for the national forest service, especially in light of the rising popularity of the sport. There are parts of this proposal that I agree with, including evaluating when climbing in having adverse impacts on areas and issuing special use permits, especially for popular climbing routes. However, I do not agree with the language regarding fixed anchors. Fixed anchors are critical to climber safety on many routes where natural protection is simply not available. The installation and maintenance of fixed anchors has been the responsibility of the climbing community for generations. These communities have generally upheld ethical standards regarding fixed anchors that meet the definition of "Minimum necessary to facilitate primitive or unconfined" (eg placed only where necessary, drilled or placed using hand powered tools). The placement and maintenance of fixed anchors takes specialized knowledge and sometimes requires fast action to mitigate dangerous situations. The proposed language that "a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination" may place a person without the requisite knowledge or experience in a decision making position or delay the timely implementation of a safety intervention. Life and limb could literally be at risk. A better option would be for the USFS to partner with or contract with an organization such as Access Fund or American Safe Climber Association to make informed decisions regarding fixed anchors. The language "existing fixed anchors and fixed equipment in wilderness may be retained pending completion of a Minimum Requirements Analysis" also seems problematic as it would be a Herculean effort to assess every existing route in wilderness and then manually remove fixed anchors on every one that does not pass muster. Furthermore, removing classic routes would be disrespectful to the legacy of American limbing and have harmful impacts on communities that rely on revenue from climbing tourism. Please consider the feedback from climbing communities and other communities that would be impacted.