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Comments: I have been climbing for 25 years, since I was a child. Climbing, mostly outdoors on public land, has been my passion and a stabilizing force in my life all through high school, college, and into my adult life. All of the climbing areas that I have access to are on public land, managed by the USFS and BLM. Some are in wilderness. But when I think of the climbing areas that inspire me most, they are almost all national parks and many of them are in wilderness - the Black Canyon, Yosemite National Park, Joshua Tree, Zion - these are the destinations that ignite my imagination and inspire me more than anywhere else. Each of these areas is very unique, the climbing is unique, and the hardware that we use is unique, but what is not unique is that fixed hardware is a key piece of absolutely necessary safety equipment.

Also, I work at a nonprofit conservation organization. Every day, my job is to advocate for wilderness protection, wildlife habitat protection, and smart land management policies. I advocate for a strong interpretation of the Wilderness Act. However, I am concerned about the implementation of this new proposed policy.

1. The questions implicit in an MRA don't make sense for fixed anchors. An MRA essentially asks, is this climb, or this individual piece of hardware, necessary for the administration of wilderness? If climbing is an acceptable and desirable use of public lands, it is not any one climb, or any one anchor, which enables climbing. It is the ABILITY to place fixed anchors when necessary for safety that is necessary for climbing, and the ABILITY to maintain that hardware. How could you possibly determine that one fixed anchor is necessary for the administration of the land, and another is not? Climbers must be able to utilize safety gear like fixed anchors when necessary in order to practice this sport, which means so much to so many. A better question to ask is whether any climb negatively impact ecologically sensitive areas? If it does, consistent with climbers' history of stewardship, the vast majority of climbers would support and respect its removal.
2. Existing anchors should be grandfathered in. Many of these were placed before land designations were established, and places with careful attention to guidance previously issued by land managers (such as using only hand tools to place hardware in wilderness, and placing fixed anchors minimally and only where absolutely necessary for safety in remote and wilderness areas).
3. Conducting an MRA analysis on existing routes is highly impractical. Conducting an MRA on each of these climbing routes, much less on every piece of fixed hardware, is quite literally an impossible task, and would require staff with technical rock climbing skills to reach and evaluate many of these anchors.
4. Further, climbers who wish to abide by the law would have to wait to replace old and dangerous hardware until an MRA was conducted. I have volunteered countless hours of my own time and thousands of dollars of my own money to purchase and replace fixed anchors on public land, and I am very familiar with the maintenance needs of anchors. However, doing this requires a specialized skill set, and even many of my climbing partners don't possess the skills or equipment to know when hardware has reached the end of its life and to replace it. I often feel like I am replacing anchors as a service to newer and less experienced climbers (I was once one of these climbers) in order to keep our community safe. However, I don't want to break laws by replacing hardware. The MRA requirements puts climbers who want to do community service and replace existing hardware in a bind. One solution would be to grandfather existing fixed anchors should be grandfathered in to any new system. Additionally, any law should include not punish those who are being good stewards and replacing outdated equipment.
5. Climbing anchors are essential safety equipment. The fundamental prohibition of fixed anchors contradicts the stated idea that climbing is an appropriate use of wilderness, as you cannot have climbing without the ability to place minimal fixed gear when required for safety.
6. Climbing on public lands is a major economic driver in many places. It is important that we do not reduce the ability to participate in this sport. For example, the small town of Lander, WY relies on 4.5 million dollars annually brought in by rock climbing, which occurs on forest service, BLM, and wilderness lands around Lander. This

figure was published in a study Commissioned by the Central Wyoming Climbers' Alliance (WyoClimbers), funded by a grant from the Access Fund and conducted by researchers from Eastern Kentucky University (EKU).
7. Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands 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.
8. Guiding climbing is a major economic driver and guide services employ thousands (millions?) across the country. Guides require fixed anchors to facilitate these experiences for clients, who may never otherwise have such an opportunity for personal growth and enjoyment of the outdoors. Guides must comply with land management laws; even a temporary restriction on their ability to use anchors while MRAs are conducted would have major ripple effects for their businesses and employees. This is another argument for grandfathering existing anchors and their maintenance into any new system.
9. This regulation might prohibit important scientific advancement. Climbing has been increasingly used by scientists working alongside professional athletes like Will Gadd and Alex Honold to enable research of previously undocumented ecosystems. Such ascents, similar to guiding, require some fixed anchors in order to allow the safety of scientists. This work benefits wilderness and public lands.
10. The fixed anchor requirement applies not only to climbers. Mountaineers, backcountry skiers, and other recreationists who require safety anchors to descend from mountains would be impacted by this.