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Comments: I'm writing to provide feedback in opposition for a number of aspects of the Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas.

I believe as the procedure stands, it will discourage climbing in wilderness areas, due to a higher barrier to entry for climbing without fixed anchors, and less belief that the anchors that exist are safe to use.

Prohibiting the replacement of anchors is a safety issue. Climbers have self-organized in order to ensure that those using the climbing environment have the ability to replace anchors when they need to be replaced. The MRA puts bureaucracy in the middle of ensuring the anchors are replaced, and the delay or lack of knowledge of the administrator will likely lead to increased risk for climbers.

Prohibiting the placement of new anchors limits the exploration of wilderness areas. Many other forms of recreation are allowed in wilderness areas (hiking, biking), all of which leave some form of trace on the land, like trails. If visual inclusion is an issue, there are alternative solutions, such as requiring camouflaging the anchors to consider. In my years of climbing, I've found other recreators normally love seeing climbers on big rock faces. Dozens of people have stopped me asking about climbing, which wouldn't have happened if we we're not able to access.

Decreasing the number of climbers is a missed opportunity to get more people engaged in environmentalism. As a relatively new outdoor climber, I've found climbing in wilderness areas like Joshua Tree & Rocky Mountain, a key contributor to my interest in environmental conservation and doing my part to limit the impacts of climate change. It was critical for me to have access to fixed anchors that we're both there and regularly replaced. It made the barrier to entry lower and more inclusive, which is critical when trying to foster inclusion in outdoor activities.

Finally, 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.