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Comments: I write today asking you to amend the proposed guidance of FSM2355 Climbing Opportunities #ORMS-3524. The existence of fixed anchors in Wilderness is one that predates the Wilderness Act itself, and the management of fixed anchors in Wilderness is an issue the federal land management agencies have struggled to preside over for at least 30 years now. Presently, the newly proposed guidance fails to improve upon the clarity or administration of existing management guidance, nor does it create a practical future for more strict Wilderness protection or enforceable fixed anchor management. I've led a life defined by outdoor recreation - and especially rock climbing - and the appreciation of wild spaces, guided by a value set that considers the pristine nature of the wilderness experience as an inseparable factor relative to the physical objective itself. Decades of climbing in National Forests, National Parks and BLM Land have all helped me create that value set from real life experiences, and now as I've become a father of two, and also my work for Patagonia - who's mission is to "Save our home planet" - has made the protection of both Wilderness and Wilderness climbing experiences priorities in my life's work. As the use of fixed anchors at belays and rappels is nearly essential to climbing, and climbing is noted as an approved recreational use of Wilderness, the prohibition of fixed anchors as "installations" becomes a defacto prohibition on climbing in Wilderness.

It's from this position that I ask you to amend the proposed guidance. I am aligned with the proposal's intent, but I don't believe the Minimum Requirements Analysis (MRA) is an appropriate process for assessing fixed anchors. Instead, I advocate for an alternative proposal that supports the Wilderness Act more strictly and describes a more coherent and enforceable policy for fixed anchor management in Wilderness. Key to achieving this is (1) a better definition of types of fixed anchors and appropriate use cases of each within Wilderness, (2) a more appropriate process for managing fixed anchors, and (3) guidance that provides greater autonomy to each Forest to administer per the unique needs of the lands they steward. Essential to achieving these outcomes is a process that brings climber user groups and Wilderness advocacy groups together to collaborate on a solution that protects Wilderness values while describing a concrete and enforceable guidance for fixed anchors in Wilderness. To accept the current guidance as drafted would open up new vulnerabilities to erode the Wilderness Act beyond fixed anchor management and alienate climbers from the broader coalition of Wilderness stewards; a coalition we desperately need to keep broad and intact in defense of greater threats of extraction, pollution and development of our Public Lands and wild spaces.

Using a Minimum Requirements Analysis (MRA) to Assess Fixed Anchors is an Inappropriate Process for Permitting Public Activity in Wilderness and Undermines the Wilderness Act

The greatest issue with the new proposed guidance is that an MRA is designed only to assess installations made to administer Wilderness, defined as "improvements" to Wilderness. Fixed anchors never fall into this category. Not only do fixed anchors fail to meet the criteria of "improvements" as they aid in recreation, but opening an MRA process up to public solicitation is both antithetical to its administrative intent, and sets a slippery slope precedent for the public to dictate "improvements" that they deem adequate of meeting the wilderness character parameters.

As I'm sure you've learned in more explicit comments from others, applying the MRA process to fixed anchors is an incompatible use of a management tool intended for administrative personnel and application. It is impractical to think that in the real-life application of climbing in Wilderness, when the use of fixed anchors for safety and retreat are essential, and sometimes made in the moment, that climber's would be able to utilize a prolonged application process such as an MRA.

The MRA process was never intended to be available to the public for submission. It is an administrative process,

and for good reason, as the Forests are responsible for the protection and management of Wilderness, and allowing the Public to drive initiatives and MRA applications on the "installations" they argue as permissive under the rubric of Wilderness character would create a litany of vulnerabilities that would belabor the agency and compromise the resource.

A top-down, one-size-fits-all approach like the MRA Process is hypothetically easier to understand, communicate and administer, but is otherwise impractical in this case to administer for fixed anchors, and creates little to no autonomy for given Forests to manage specific to their land resource, constituent parties, history with rock climbing and staff and budget constraints.

Additionally, the MRA process is overly burdensome and unrealistic for the application of fixed anchors. I fear that such an untenable process might push climbers into a space of non-compliance with management guidelines and result in vigilante tactics to place or replace fixed anchors for the necessity of safety. A policy is only as powerful as the agency's ability to enforce it, and the activity of climbers way off the ground and deep in Wilderness is extremely challenging for the Forests to actively police, even if they so desired.

#### The "De Minimis" Framework is a Better Solution for Managing Fixed Anchors in Wilderness

The "de minimis" framework is overtly rejected in the proposed guidance, but ignores the practicality of how that framework is currently applied to other circumstances impermissible by the language of the Wilderness Act, and also fails to recognize its value in providing adequate autonomy to given Forests to make a ruling on what constitutes "de minimis" for fixed anchors in their own unique Wilderness. If a mechanized camera shutter is de minimis, or use of a gas stove, or any of the other exemptions made to contradictions to the Wilderness Act, then a similarly rationale case for fixed anchors seems permissible too. Although fixed anchors are left behind, they are virtually invisible unless you are immediately upon them, and a definition of de minimis that isolates fixed anchors to only belay/rappel stations and non-intensive, essential-for-safety uses would dramatically reduce both their placement and the foot traffic and other related impacts of Wilderness climbers. Allowing given Forests to draw those "de minimis" distinctions for themselves uniquely, and to distinguish types of fixed anchors, would be most valued and administrable.

#### The Responsibility and Management of Fixed Anchors is a Liability and Resource Challenge the USFS Would be Naïve to Place Upon Themselves

As stated in the proposed guidance, the necessary level of Forest oversight and liability to catalog and manage all existing and new fixed anchors is both unrealistic in its scope and a financial liability the Forests would be naïve to assume. Climbers have always climbed at their own risk, and that includes the use of fixed anchors, and it should stay that way. If by this new guidance the USFS is inserting itself as the manager of not just a climbing management plan, but the fixed anchors themselves, the USFS makes itself vulnerable to the active management of those anchors and also the exposure of litigation in the event of an injury from a fixed anchor failure. Although the proposed language creates space for inactive management if USFS resources are insufficient, it still puts the burden on the agency's judgement, as opposed to the climbers. The actual management of fixed anchors, ala the management of other "installations" in Wilderness, would be a dire mistake for the USFS to assume.

#### There Exists a Better Guidance to Both Uphold the Wilderness Act and Protect Rock Climbing in Wilderness

Ultimately, this decades long tension over the management of fixed anchors in Wilderness has been a big distraction from more meaningful threats to Wilderness. it's essential to maintain a broad-based coalition of users and interest groups to counteract the real threats of extractive industry, development, or pollution, whether in defending or administering the Wilderness Act explicitly, or applying the conservation and stewardship values and practices of the Wilderness Act to the protection of other pristine non-Wilderness spaces. The greatest

existential threat to humanity is the climate crisis, and the misuse of Public Lands and undeveloped wilderness is an active battleground in combatting that threat. The decades of in-fighting over the management of fixed anchors has caused significant damage in fracturing climbers from the broader coalition of users and Wilderness stewards, and I would argue more so than it has solved in the actual practices of climbers and fixed anchor placements and usage. Every time fixed anchor management makes headlines, it is presented as "climbers v. wilderness", and a general public, uneducated about the specifics of the issue and unfamiliar with the needs and interests of climbers at large, often wrongly sees climbers as outside the interests of Wilderness. This is clearly not the case, as climbers were original advocates of the Wilderness Act, a self-organized user group that has shown tremendous partnership with land managers, and remain incredible advocates of Wilderness protection and stewards of Public Lands.

For this reason, the specifics of a solution that uphold the priorities described earlier would be best achieved through a collaborative process with groups representing both climbers and Wilderness advocates. As stated earlier, the priorities of that alternative proposal would support the Wilderness Act more strictly and describe a more coherent and enforceable policy for fixed anchor management in Wilderness. Key to achieving this is (1) a better definition of types of fixed anchors and appropriate use cases of each within Wilderness, (2) a more appropriate process for managing fixed anchors, and (3) guidance that provides greater autonomy to each Forest to administer per the unique needs of the lands they steward.

There exists a more productive way to achieve Wilderness protection, enforceable fixed anchor management, and support from a broad-based coalition of interested users and USFS constituents. Please reject the current proposed guidance and consider the above-mentioned comments to initiate a process and draft desired objectives that gets to a better fixed anchor management guidance and outcomes for Wilderness and also climbing in Wilderness.