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Comments: We are pleased to see the US Forest Service making overtures to update the 2320 Wilderness manual. We understand that this was in response to direction in the 2021 Consolidated Appropriations Act. Which may explain why direction on climbing is being developed, instead of addressing more pressing issues, like restoration projects that are being proposed in Wilderness in response to climate change. We have many issues with your proposed directive. First and foremost is the statement in proposed FSM 2355.32, para. 5; "issuance and administration of special use permits are encouraged to enhance visitor access..." This is blatantly illegal and needs to be removed. The Wilderness Act states that, "Commercial services may be performed...." to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas." This is a far cry from "encouraging" commercial services. Your directive should say that commercial services may be permitted only after an assessment is completed that determines that service is necessary. Also, many Wildernesses are already being "loved to death". So, why exactly would you want to enhance visitor access? Rock climbing, though a legitimate use of Wilderness, can and frequently is, very impactful. Even if permanent bolts aren't installed, climbers typically will build social trails to get to rock faces, human waste and trash are frequently issues, and Wilderness Rangers don't typically patrol these areas. Our next issue is that fixed anchors and fixed equipment are structures and installations and are strictly prohibited in Wilderness "except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act." Your directive states that a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes, "including primitive or unconfined recreation..." This is not what the Wilderness Act says. It says that installations can be approved if they are the minimum necessary to administer the area for the purpose of the Act. The purpose of the Act is found in Section 2 (a) "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness." You propose that existing fixed anchors and fixed equipment can be retained pending a Minimum Requirements Analysis (MRA). The interagency MRA workbook asks the writer to describe the issue to be resolved. The issue statement may be a problem, situation, or opportunity. Then it asks, "Is this issue wilderness dependent or can an action occur outside of Wilderness to properly resolve this issue now or over time?" We would argue that if climbing opportunities exist outside of Wilderness, there is no justification for allowing continued fixed anchors and/or approving new installations. As for new routes; each new route must be approved by a line officer only after an MRA and NEPA are completed. Since climbing routes are vertical trails, the same analysis that is completed for building or replacing a bridge in Wilderness should be required for a climbing route, if it includes fixed anchors or fixed equipment. The assessment should include a determination that no nesting birds will be affected or vegetation damaged from climbers "cleaning a route." Just like the USFS would not condone or encourage visitors to build new trails or structures, such as bridges, they should not allow new climbing routes without the same level of analysis as other installations and structures in wilderness receive. The proposed directive as written has some legal issues and it doesn't seem very helpful at all. Your forests and Ranger Districts are looking for clear, concise direction. Your proposed directive essentially kicks the can down the road by putting the onerous on the forest and districts to complete a "management plan or assessment" without any sideboards. We suggest that you simply use this direction that already exists: 2323.13 - Improvements and Nonconforming Facilities and Activities Provide facilities and improvements only for protection of the wilderness resource. Document and justify conditions for providing facilities and improvements in the forest plan. Install facilities as a last resort only after trying education, other indirect management techniques, or reasonable limitations on use. This, in addition to the direction in 2320 regarding bridges and trails, should be reiterated to include climbing routes.