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Comments: I am highly concerned about section 2355.21 number 12, "Restrict or prohibit the placement or replacement of fixed anchors and fixed equipment in wilderness unless specifically authorized based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes." Restricting the replacement of climbing equipment will restrict the replacement of climbing equipment that needs to be replaced due to safety reasons. If there is a delay (which, unfortunately, is inevitable when working with the government) in replacing climbing equipment or fixed anchors, there will be deaths. Section 2355.32 number 4 even acknowledges this, stating "Placement of new fixed anchors and fixed equipment in wilderness is allowed without prior authorization supported by a Minimum Requirements Analysis to respond to an emergency involving public health." It is unreasonable to assume that the government will ALWAYS be able to complete a timely review of every single anchor and fixed equipment that needs replacing, and it is disgraceful that an accident is the only way to exempt this review.

I am also concerned by the use of "minimally necessary", which is stated in the section above and reiterated in section 2355.32 number 2: "an analysis of whether placement or replacement of fixed anchors and fixed equipment is the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character." The "minimum necessary" amount of fixed equipment is highly subjective and appears to focus on how the equipment looks ("wilderness character") rather than the effectiveness and safety of the fixed equipment. For example, many sport (and mixed trad/sport) routes over the years have had bolts added, which increases safety and decreases the risk of death for climbers. However, as the route previously existed without the additional bolts, it could be argued that the new bolts added are more than the minimal necessary, and thus would not be approved per this directive. Generally, increasing the amount of fixed equipment beyond the "minimally necessary" would have few impacts on the environment but would have significant safety improvements. Maintaining reasonable safety for climbers should be a much higher priority in this document than it is.

Thank you.