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Comments: Assuming the Wilderness Act applies to National Forest property the same Park Service property, the same reasoning exists for NOT ALLOWING permanent anchors for rock climbing in designated Wilderness Areas.

The following quote is from DRAFT REFERENCE MANUAL 41: WILDERNESS STEWARDSHIP Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness:

"Fixed anchors fall into this definition because they are installed and remain in place long after the installer has left. Although fixed anchors may be small, there is no 'de minimis' exception to the Wilderness Act's restriction on installations, and the combined impact of many fixed anchors in a single area or rock wall can have a significant effect on wilderness character. Therefore,

"fixed anchors constitute a prohibited use pursuant to the Wilderness Act §4(c) and may only be authorized if they are determined to be "necessary to meet minimum requirements for the administration of the area for the purpose of [The Wilderness Act]" through a minimum requirements analysis (MRA)."

There is no way that fixed anchors can contribute positively to DESIGNATED WI:DERNESS. They cannot be legally allowed, and should not be allowed by some administrative action.