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Title:

Comments: I am writing to you in regard to proposed policies governing rock climbing in the designated Wildernesses on National Forest System lands. In that regard, I would like to remind you that the Wilderness Act prohibits installations and structures like permanent fixed climbing anchors in order to protect the areas' wild character. Fixed climbing anchors must not be allowed in Wilderness.

The Wilderness Act's strict prohibitions, including its prohibition on installations, cannot be overcome by a desire to facilitate or enhance a particular form of recreation, and the narrow administrative exception for installations does not extend to the general public seeking to create developed recreational activities in Wilderness.

The agencies' primary duty is to protect Wilderness in its natural, untrammeled state, and the Wilderness Act's ban on installations can only be overcome in rare administrative circumstances where the installation is necessary to protect Wilderness in its natural, untrammeled state.

Agencies have no duty to develop Wilderness to provide "opportunities for primitive recreation." Wilderness, by its very existence, provides these opportunities-the agencies need only to protect the Wilderness according to the provisions of the Wilderness Act to safeguard the opportunity.

For those climbers seeking developed climbing opportunities, there are ample permanently bolted climbs outside of Wilderness.

Wilderness is an endangered landscape. Less than 3 percent of land in the Lower 48 states is protected as Wilderness, and it is under threat, including from rapidly escalating recreation pressures.

Any specific proposals for permanent fixed anchor installations in Wilderness must be subjected to public notice and an opportunity for public comment pursuant to the National Environmental Policy Act.

Thank you for considering my comments.