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Comments: The following are comments regarding the National Park Service's (NPS) and the U.S. Forest Service's (USFS) proposed policies governing rock climbing in the designated Wildernesses that the agencies administer.

Both agencies are incorrectly proposing policies that elevate recreation above wilderness protection. This will permanently scar and degrade Wilderness through the installation of fixed climbing anchors. It is the mandate of both agencies to protect Wilderness from this defacement.

Rock climbing without permanent fixed anchors is generally compatible with wilderness preservation. Using removable protection like slings and chocks is also generally compatible. But permanent fixed climbing anchors, like bolts and pitons permanently pounded into Wilderness rock faces, diminish an area's wild character. Not only are such installations lasting signs of human development, but they also attract and concentrate use-at great expense to native plants and animals for whom Wilderness is often a last, safe refuge. Climbing in Wilderness existed long before modern methods of placing fixed anchors became prevalent and increased the ability of climbers to climb thus far virtually impossible "routes."

Permanent fixed anchor use and maintenance in Wilderness is-and always has been-prohibited by the Wilderness Act's ban on installations. Climbers who insist on using materials and methods that harm Wilderness and risk the quality & existence itself of Wilderness should use non-Wilderness facilities to climb. If they can't be responsible stewards, their activities simply should not be allowed. They have a right to access Wilderness, but they do not have a right to destroy any of it. If anything, they have a responsibility to protect Wilderness for everyone's benefit.

It regrettably seems as though the NPS and USFS have listened too closely to some climbers and lobbyists for the trillion dollar a year outdoor recreation industry, instead of listening to wilderness advocates, since they are proposing new policies that attempt to legalize the use of fixed anchors in Wilderness areas administered by the NPS and USFS.

Fixed climbing anchors must not be allowed in Wilderness. The Wilderness Act specifically prohibits installations and structures like permanent fixed climbing anchors in order to protect the areas' wild character.

This strict prohibitions, including its prohibition on installations, cannot be simply 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. 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.

These 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.

Wilderness is an endangered landscape. Less than 3 percent of land in the Lower 48 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.

Please do not pursue these proposed policies governing rock climbing.

Thank you for the opportunity to comment.