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Comments: Dear USFS, thank you for the opportunity to comment on the proposed guidance on the use of fixed anchors on federal lands. I have also submitted this feedback to the NPS.

The National Park Service and USDA Forest Service have proposed new guidance that would restrict the use of fixed anchor positions. Future use of fixed anchor positions would require a "Minimum Requirements Analysis" by the agency, which will add bureaucracy and significant time delays.

I strongly believe the proposed restriction disproportionately affects camps, which serve as a vital gateway for thousands of youth to experience the outdoors. Camps, by their nature, often involve participants and staff members with limited training, making fixed anchors a critical tool for ensuring safety in rock climbing programs.

This restriction discriminates against and limits access for those who rely on fixed anchors for rock climbing. In many situations, this will create an unintended division of access, potentially allowing those with technical skills and training, often obtained at great cost and time, potential access, while restricting the more diverse, yet less technically proficient summer camp participants and staff from safe enjoyment of the resource.

I strongly request:

*The continued use of existing fixed anchors without further review, unless there are site-specific resource concerns;

*Allowing the maintenance of existing fixed anchors without prior approval, unless there are site-specific resource concerns; and

*The authorization and placement of new fixed anchors in the wilderness with a simple and efficient permitting process that does not require an MRA, as is current practice under NPS Director's Order 41.

*Creation of a Study Group with participation from the camp industry in the development of any guidelines related to climbing activities in the wilderness or wild areas.

Thank you.

Tom Rosenberg