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Comments: I am commenting today on behalf of R.M. Pyles Boys Camp on the proposed new guidance around the use of fixed anchor positions. Our camp serves 400 plus at-risk youth and strongly believes in the need for camp programs to expose youth to nature and wilderness areas. Many camp programs like ours use climbing routes that rely on fixed anchors to provide safety and simplicity to beginning climbers, like their campers. The proposed rules would hamper those activities by requiring lengthy bureaucratic reviews of even existing anchors that have been in place without issue for many years.

This guidance, if accepted would discriminate again and limit access to rock climbing to those that need it the most, beginners. Fixed anchors provide a level of safety and security that beginning climbers, such as summer camp campers, need in order to learn to feel comfortable climbing.

It is my recommendation that the following steps be taken in regards to this guidance:

*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 Minimum Requirements Analysis, 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.

We share the desire of the Great American Outdoors Act to encourage participation in the outdoors and believe that we serve a vital role in getting young people who would not otherwise be exposed to federal lands. These proposed rules would hamper our ability to provide rock climbing activities to our campers. We look forward to working with the National Park Service and USDA Forest Service to develop guidelines that benefit our campers while also protecting our valuable wild spaces.