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Comments: I am commenting today on behalf of Gold Arrow Camp on the proposed new guidance around the use of fixed anchor positions. Our camp serves 1300 children each summer and this guidance would negatively impact our program as it would cause fixed anchors which we use to give children exposure to rock climbing to no longer be accessible. Due to the proposed guidance's requirement of a Minimum Requirements Analysis, it is incredibly likely that climbing routes utilizing fixed anchors that have, in many cases, been in use for decades would no longer be available for use by camps and our campers.

This guidance, if accepted would discriminate again and limit access to rock climbing to those who 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 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.

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.