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Comments: In regard to the directives relating to FSM 2355 Climbing Opportunities #ORMS-3524, I believe it should not be enacted as it is currently written for the following reasons.

- There is no specific mention or guidance on Wilderness Study Area (WSA) management.
- The document includes ice screws and pickets as "fixed protection" that requires a Minimum Requirement Analysis (MRA). This indicates fundamental lack of understanding at the agency level of what is to be managed. Both ice screws and pickets are NOT fixed protection. There is a large difference between placing fixed protection and failing to collect a piece of removable protection. The current wording will cause confusion for land managers and land users, and be generally impossible to consistently enforce.
- Ice climbing routes often form and disappear in 24 hours. It is not possible to obtain an MRA on this timeframe.
- The document should better incorporate the Protect America's Rock Climbing Act (PARC - H.R. 1380), use it as a starting point.
- The placement of fixed protection has been, and will continue to be, done for no profit by people during climbs. The replacement of these is also done in a not for profit manner. If this document is enacted, people wanting to replace worn hardware will be put under undue hardship. This will result in unsafe conditions.
- The NPS Backcountry and Wilderness Use Permit Application in Appendix A requires the quantities of hardware and equipment subject to permit. Often this is not known when creating a new route. Depending on the type of route, this can widely vary and is impossible to know until the route is climbed. Adding to this, the expertise needed for oversight is not possible at the governmental level.