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Comments: I am writing to express concerns with specific aspects of the proposal "Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas".

I am a rock climber and have enjoyed climbing with my family in various national forest areas which would be impacted by the proposal.

I am particularly concerned about the safety impact of the proposal and do not see any analysis of the safety impact or tradeoffs of the proposals in the government's assessment. For example, the proposal's interpretation to include material such as slings as installations creates a significant safety issue in the event that a climber needs to bail on a route before reaching the top (for example, due to an approaching storm or injury). Prohibiting the use of a sling or other form of rock protection to create an anchor in order to lower to the ground in exigent circumstances creates a serious safety issue.

Additionally, I am concerned that the proposal disparately impacts access to climbing for specific portions of the population. Under the proposal, my understanding is that it would still be permissible to cleanly climb a multi-pitch route all the way to the top (and exit off the top, leaving no gear behind). But as someone who climbs with young children, it is often difficult to climb multi-pitch routes. Instead, we climb the first pitch of routes and lower from fixed anchors from the first belay to the ground. This proposal would foreclose us from engaging in such climbing, as it would others who are similarly situated (i.e., families, climbers with less experience, etc). I do not see any analysis of whether the government's proposal would have any disparate impact on any groups of individuals seeking to recreate in the wilderness.

At a minimum, I recommend the following modifications be analyzed and incorporated before the promulgation of any final document:

(1) Create an exemption for the placement of an "installation" (e.g., a sling or nut) when necessary to exit a route in exigent circumstances such as threatening weather or health issue. The exemption could even be limited to "removable" installations such as slings, nuts, or cams, so that the "installation" could be subsequently removed with no impact to the wilderness. The justification of this exemption is that it would likely result in a minimal impact (e.g., minimal number of temporary installations) but would greatly mitigate the adverse safety impact of the proposed regulation.

(2) Create an exemption (or at least a presumption) that existing fixed anchors at the top of the FIRST PITCH of climbs remain permissible. The justification of this exemption is that it would only apply to a small amount of installations (the anchors at the top of pitches, not the bolts leading to them) and would ensure that the proposal will not have a disparate impact on wilderness access to any groups of individuals, including families, less experienced climbers, or anyone unable to climb multipitch routes.

Thank you for your consideration.