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Comments: We appreciate the opportunity to provide comments on the proposed guidance for managing climbing and safeguarding natural and cultural resources in wilderness areas. In summary, we strongly urge the National Park Service and Forest Service to withdraw the draft guidance due to its material negative impacts on youth participation in rock climbing through summer camps.

Overview:

We are a big supporter of wilderness and wild lands, with a 75 year history of operating summer camps and outdoor education programs which teach young people to enjoy, respect, and care for our public lands. However, we are concerned over the potential new restriction on fixed anchors outlined in the draft guidance.

For the past 50 years we have been providing top-roped instruction in rock climbing to young people on several areas in the Pike National Forest in Colorado. We have also judiciously utilized fixed anchors as a minimum tool that enables our youth to access these rock climbs enabling unique experiences of confidence building and appreciation of our public lands. Thus, we are concerned that these anchors could now be considered prohibited installations subject to Minimum Requirements Analysis resulting in potentially long or endless delays in replacing or installing vitally important safety anchors for campers and staff. It is unreasonable to create new guidance policies prohibiting these anchors when they have been allowed, managed and authorized for decades.

We see fixed anchors as an essential piece of an overall safety system for climbers and staff. We acknowledge the importance of managing climbing activities in wilderness areas to protect the environment and cultural resources. Nevertheless, the proposed restriction disproportionately affects summer camps, which serve as a vital gateway for youth to experience the outdoors.

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 participant and staff from safe enjoyment of the resource.

The proposed Minimum Requirements Analysis includes no timeline for completion and we know that these reviews can take years or decades-we fear that the specific areas we use for rock-climbing will never make receive this attention.

Looking forward, we urge the formation of a strong stakeholder inquiry that expressly involves the critically important camp industry. Given its formative position in enabling youth to experience the outdoors, and thus creating advocates for wilderness and the outdoors, the camp industry has valuable insights to contribute to the development of policies that balance the preservation of wilderness areas with the need to provide safe and enriching outdoor experiences for the next generation.

We recommend:

?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 wilderness with a simple and efficient permitting process that does not require an MRA, as is current practice under NPS Director's Order 41.

Additionally, we request additional participation from the camp industry in the development of any guidelines related to climbing activities in wilderness or wild areas. The unique needs and challenges faced by camps, particularly in terms of fixed anchor usage for rock climbing, necessitate a comprehensive understanding of the industry's perspective. We propose the inclusion of camp professionals, educators, and representatives from the camping community in the stakeholder process to ensure a well-rounded and informed approach.

Conclusion:

We urge the USDA Forest Service and National Park Service to withdraw the current draft guidance. The proposed restrictions on fixed anchors pose a significant threat to the safety and accessibility of rock climbing programs at camps, ultimately undermining the positive impact these experiences have on youth engagement with the outdoors. We remain committed to working together towards the shared goal of preserving wilderness areas while ensuring that the next generation has meaningful and safe experiences in the great outdoors. Thank you for considering our recommendations and for your ongoing dedication to the protection and accessibility of our nation's wilderness areas.