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Comments: I am a novice to outdoor climbing but I am disappointed in the direction indicated by this proposal. The existing policies for fixed anchor placement in wilderness areas (following NPS Director's Order 41) recognize that climbing is a legitimate use of wilderness areas and that occasional placement of fixed gear for ascent or descent does not alter the wilderness character of an area.

Reclassifying these placements as installations in wilderness areas will amount to a de facto ban on creation of new routes and create impediments to the maintenance of existing, and in some cases historically significant routes. See the impact of regulating bolting activities on the creation of new routes at the New and Red River Gorges for examples of the chilling effect these regulations can have even when a process does exist for approving new routes. The MRA process for getting exemptions for installations is unlikely to be feasible, especially given the lack of funding to support the administrative burden of these applications.

I am just building the skills to climb outdoors and I am looking forward to experiencing the beauty of these wilderness areas through rock climbing. If this proposal is accepted, these areas will slowly become closed to climbing as anchors become unsafe due to the increased burden this regulation will place on the volunteers who maintain these public resources (the fixed anchors that make these climbs possible). There is no need for this new guidance, the existing system is working well, and leaving that system in place will maintain the support of the climbing community for wilderness designations.

Thank you,

Dylan Nielson