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Comments: Thank you for accepting comments on this draft manual. I support the protection of wilderness and like many climbers I believe that fixed anchors, while integral to roped technical climbing, should be rare in wilderness, only used when necessary.

I would like to object to two aspects of the draft manual:

2355.03 - Policy - Paragraph 5

This adopts an interpretation of the Wilderness Act that is controversial, poorly supported by the Act's language, contradicts 59 years of agency behavior, and is not actually needed to empower the Forest Service to regulate fixed anchors. Fixed anchors should not be regulated as "installations" under the Wilderness Act.

The application of the MRA process is not appropriate for small, unobtrusive, personal safety gear such as fixed anchors. Because the Forest Service has not previously required MRAs, or previously regulated fixed anchors as "installations," there are numerous fixed anchors in wilderness today without MRAs on file. Overnight these would become prohibited. Such an abrupt approach invites legal challenges (from either side) that could bog down any proposed climbing management plan for years.

I also creates needless conflict with climbers, many of whom are eager to partner with the Forest Service and other agencies to help protect wilderness.

The Forest Service should instead define objective criteria that climbers can use to guide their use and management of fixed anchors. Forest Service units should engage local climbing communities and organizations to help develop, disseminate, and promote these new criteria.

This objection also applies to 2355.21 - Climbing Management Plan, Paragraph 12.

2355.31 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment Outside Wilderness - Paragraph 3

The Forest Service, by micromanaging the placement and management of fixed anchors outside wilderness, risks placing itself in the position as a provider of climbing. Forest Service staff do not have the expertise to evaluate what constitutes an "extensive" or "arbitrary" placement or replacement of a fixed anchor. Neither are they equipped to determine what is or is not an "established climbing opportunity."

Forest Service climbing management plans should not attempt to manage climbing the way a climbing gym manages their routes. The Forest Service does not have the expertise or resources to do so competently.

Instead, the Forest Service should define objective criteria to guide the self-driven development and management of climbing areas within national forests, by climbers for climbers. The Forest Service should also inventory and regularly check all climbing areas to ensure they are not damaging forest resources. Should such problems be found, the Forest Service can apply its existing regulatory authority to create a remedy. This could include restricting or even prohibiting climbing in an area of a national forest--but only if such a remedy is substantively required to protect resources.

Thank you for reading my comments.