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Comments: I write to oppose the the USFS's interpretation that fixed climbing equipment is an "installation" under Section 4c of the Wilderness Act. For many climbers I know, the solitude of wilderness is important, and rock climbing in a wilderness area offers about as much solitude as you can possibly find. Many of us seek out these experiences, because they are powerful. The power that these experiences hold makes us want to protect the wilderness resource so that others and generations to come can have the same experience.

Climbing is a legitimate use of wilderness areas, and the United States of America is perhaps the best place in the world to experience wilderness climbing due to the rich history of route development in truly wild places. Climbing and the use of fixed equipment is consistent with the purpose statement of the Wilderness Act which provides in part that Wilderness "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable" and "has outstanding opportunities for solitude or a primitive and unconfined type of recreation." These provisions are compatible with fixed equipment. Fixed equipment facilitates "opportunities for solitude and [] unconfined recreation" while remaining "substantially unnoticeable."

Prohibiting fixed equipment presents a safety risk. While it is true that fixed equipment is not required for all climbing routes, the absence of fixed anchors will increase risks for climbers, and in some cases, will make it virtually impossible to climb some routes. Climbing with fixed equipment provides climbers protection on routes where the rock quality does not present many options for the placement of cams or nuts. Without fixed equipment, many of these routes would not exist. However, an perhaps most importantly, not all routes end with a walk off of the top of the climb. Rappels are often necessary to descend, and fixed anchors are almost always necessary for a rappel descent.

Last, USFS's interpretation of "installations" could cover everything from trails, bridges, and trail signage to bolts and other fixed gear. These are all examples of "[a] thing made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness." However, they all contribute to providing unobtrusive access to opportunities for recreation in solitude and they comply with the Wilderness Act. Please reconsider an interpretation of "installations" that will prohibit fixed climbing equipment. It will lead to safety issues and reduced opportunities for wilderness recreation, while diminishing the rich legacy of climbing in America's wilderness areas.