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Comments: Once again the Forest Service proposes programs and policies in search of problems. The derision in my comment has been earned in whole by your agency's conduct and total lack of public accountability. These public comments are clearly only a legal requirement and purely a performative listening act. Your agency is an absolute joke and continues to lose credibility among outdoor users. This is due to your management's preoccupation with unrealistic, unenforceable, and questionable policies that do not reflect the public's requests, needs, and in opposition public comments.

Why doesn't your management focus on things like clear cutting up against wilderness boundaries, something that negatively affects flora and fauna? You will never be able to enforce this action against permanent anchors. Good luck doing that in slot canyons and waterfalls. And on a case by case basis, is a Forest Supervisor really going to be reviewing every anchor in an area, is that actually a good use of a Supervisor's time? I hope your agency enjoys a cat and mouse approach to going after 'unauthorized' anchors, of which you can be sure there will be many.

Your guidelines repeatedly reflect "as funding and resources allow" both in connection to completing a MRA and completing a climbing management plan. Yet the USFS repeatedly laments a lack of funding for all sorts of recreation related endeavors. This seems like an end-run to ultimately limit usage on public lands through bureaucratic restrictions which are not straight forward and become limited by administrative hurdles. We have repeatedly seen the USFS apply this type of policy towards public lands with the profusion of Special Recreation Permits to address perceived crowding or usage issues. It is the lazy management method. This lack of management is due to a dereliction of duty by the USFS. If it cannot be handled by an online permit system or enforced by someone in a pickup truck in a parking lot, the USFS does not have the will to engage with sensible on the ground enforcement of existing regulations in and outside of Wilderness.

This blanket rule does not make sense in many areas and also opens up interpretations of 'minimum necessary' to bureaucrats and supervisors who may have no actual knowledge of climbing or may have their own personal grudges or vision about how they think it should be 'done'.

Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Abandon this garbage rule making. Listen to the public's comments in overwhelming opposition to this MRA process.

A great example of your misguided efforts is elucidated by the comment below:

"The Agency's definition of "installation" is impermissibly broad. Fixed climbing equipment is nothing like the other items the Wilderness Act explicitly prohibits, and it is absurd to think that Congress intended the word "installation" to cover fixed climbing equipment. In fact, as former Senator Udall has explained, the record is clear that those who actually voted to create designated Wilderness never intended that designation to prohibit the use of fixed climbing equipment. Plus, countless pieces of fixed equipment existed in countless Wilderness areas pre-designation. It is hard to see how those pre-existing pieces of fixed equipment weren't an impediment enough to prevent an area's initial designation, but are now significant enough to detract from wilderness character. The arbitrary overbreadth of the Agency's definition of installation is further illustrated by the fact that it logically encompasses all manner of other human impacts that the Agency has taken no steps to prohibit. Hiker-created footpaths (i.e. off-trail travel), hiker-created river crossings (via log or stone), windbreaks, heck, even micro-

plastics from modern outerwear are all man-made and left behind by the installer after they leave wilderness. Thus, under the Agency's unlawful definition of installation, each of these should be prohibited unless allowed through the MRA process. Of course, it would be absurd to think that drafters of the Wilderness Act meant to prohibit these items from Wilderness when they decided to prohibit "other installations." The only conclusion, then, is that the Agency's definition of installation is itself absurd and should be revised to comply with the actual intent of the Wilderness Act. Properly considered, fixed climbing equipment is not an "other installation."