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Comments: The American Safe Climbing Association (ASCA) is a national 501(c)3 nonprofit dedicated to improving outdoor climbing safety, focusing on fixed anchor replacement and education. We would like to suggest one change in the Geological Resources and Current and Future Route Development section. The ASCA would like to suggest adding a new Proposed Action between Actions 1 and 2 (which we will just call Action 1.5 in these suggestions):

1.5. All new bolts must be stainless steel, with a strong preference for stainless steel glue-in bolts whenever possible.

For context with this suggested change, stainless steel bolts last far longer, and long experience with limestone shows that over time glue-in bolts will last the longest, require the least maintenance, and be the safest option. However it is not always possible to use only glue-ins without going to excessive lengths (particularly when replacing top anchors), so a "strong preference" would be our suggestion (as opposed to mandating stainless steel glue-ins).

Thank you for your consideration,

Greg Barnes

Executive Director, ASCA

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