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First name: Tim

Last name: Noble

Organization:

Title:

Comments: I am writing to voice my concern and opposition to this proposal, particularly concerning "2355.32 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness". This proposal overturns decades of precedent, stifles climbing safety and progression, and places a large administrative burden on an already overburdened FS system.

For decades, climbers have largely self managed their style and ethics and have evolved continually towards a clean climbing, leave no trace ethic. Currently, the areas impacted by this proposal (Wilderness) already largely operate off existing regulations and a climbing community ethic of placing bolts/fixed protection only as expressly needed, primarily with hand (and not power) tools. This proposal overturns that precedent where there is no compelling event to do so.

Second, this proposal will stifle climbing safety and progression. Additional regulation, delays for approvals, and quite frankly erroneous denials of bolting applications may cause unsafe bolts and fixed protection to persist until they cause an accident or fatality. Additionally, future first ascent attempts will be stifled if every bolt placed needs to be pre-approved. It is impossible to know on long first ascent attempts how much fixed protection will need to be placed, or if bolts/fixed protection will need to be placed to facilitate a retreat. Adventure in the wilderness is a key tenet of climbing, and this regulation will only help to extinguish it.

Finally, this proposal will put massive administrative burden on an FS system that is already overburdened, and in many places lacks the administrative bandwidth and technical expertise to receive, process, accurately consider, and then approve/deny fixed protection applications. On top of all this, the FS denies all responsibility related to fixed protection. I can think of no better way to open oneself up to legal and moral exposure than to make the wrong decision on a fixed protection application and then suffer a climber's injury or fatality directly related to the quality or quantity of fixed protection on a route.

In summary, the existing rules and regulations regarding fixed protection in wilderness areas are quite sufficient. I see no compelling reason to institute a bolt-for-bolt approval process, and remain incredibly concerned about the impact this new regulation will have on climbing safety, progression of the sport and the general administrative functionality of the FS.