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Title:

Comments: The proposed interpretation of a bolt as an 'installation' under the Wilderness Act upends decades of practice in wilderness areas. Existing bolts have been acceptable under the Wilderness Act until now, and there is no need to reevaluate those decades of policy.

The relatively low-impact addition of a bolt on a climbing route is essential for the existing and future rock climbing recreation in areas all over the US. This is especially true for rappel anchors where no location for natural protection exists and where climbers would otherwise be forced into unnecessarily dangerous other methods up or down their route. I say low-impact because the bolts are always installed in areas where they will not be found by casual visitors of the area-bolts are used on vertical rock faces where only other rock climbers would find them.

The prohibition of fixed anchor addition or replacement will create dangerous situations for rock climbers in years to come. The decision to replace an anchor and the action to replace it is an essential prerogative of the climbing community itself. It is essential to allow experienced climbers to replace aging anchors when and if they see fit, not at the discretion and approval of a ranger, because of the risk for other climbers who would use that route in a dangerous state. Also, there are simply situations in which climbers may find themselves where the placement of a bolt in the moment could mean the difference between life and death, and criminalizing the ability of that individual to protect themselves should never be passed into law.

Fixed anchors are a part of America's wilderness exploration history, and the routes up rock faces that they are placed on have been cherished areas for recreation and enrichment for thousands and thousands of Americans for many decades.

An improvement to these policies would be to remove the designation of fixed anchors as 'installations' and allow the community of climbers that has managed these climbing routes in the past to continue to do so in the future.

Also, the restriction of new routes in non-wilderness areas to "existing climbing opportunities" is vague, unenforceable, and overly restrictive of citizens abilities to explore their land. An improvement would be to allow opportunities for new anchors in all places except those designated as specifically protected for cultural or natural resource reasons.