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Comments: I have a few concerns with the proposed changes to bolting in wilderness areas.

First and foremost is one of safety. It has been a long cultural battle within the American Alpine Club & wilderness climbing communities at large to abandon the practice of leaving nylon 'tat' rappel stations in favor of two bolt stations that are dramatically safer for users and more in line with wilderness values. Under the new guidelines both options will be considered instillations and require paperwork and potentially fines if placed illegally. Which in the realm of the theoretical has a climber trying to safely leave a climb choosing between their own safety by using an old damaged anchor or no anchor at all, and illegally installing a new anchor to protect their own safety as well as that of future climbers on the same route. I want to take care here to point out that anchor instillation is not a common occurrence for many climbers and is often only done by the first ascent party or those parties replacing unsafe anchors as they encounter them.

The loss of the ability to climb in this style is also a loss to engage with historic practice with alpine ascents in North America stretching back over a century. Which in a personal way I find quite sad to know that I can engage with these peaks & routes (particularly those in Rocky Mountain National Park) the same way my grandfather had without engaging in climbing practices that even in the 1950's would have been viewed as unnecessarily risky, as pitons and slings were often left behind when rappelling a route even then.

I understand that wilderness as a term is often contentious, and perhaps here I will undermine my argument in some way by stating that my own opinion of wilderness as a term is somewhat negative. The idea of wilderness is too dualist and removes human beings from nature in a way that perpetuates an old-world view that can't hold up to our modern understanding of ecology. No area is truly 'untrammelled', not now in the age of climate change, and not in the past when people used wild landscapes for their own survival. With this in mind it is important to manage our designated wilderness in appropriate ways that don't remove their cultural value to the public. Meaning that recreation should be not only allowed, but also enabled.

And as the system currently sits hand drilling of bolts in wilderness is fine. Unlike outside wilderness areas where the boom in sport climbing has created management problems, maintaining the requirement to hand drill bolts means keeping a lid on the number of bolts that will be installed. For myself drilling in granite a hand drilled bolt takes at least 30 minutes to install, making it an hour to make a safe anchor. To drill a single sport style route in that fashion (~10 bolts total) would take 5 hours not inclusive of any other effort that goes into developing sport crags (typically made up of at least a half dozen routes at a single cliff site). Making the major management concerns due to crowding from sport crags a far cry from the concerns present on historic alpine or adventure style routes that this prohibition threatens.

In short, please keep in consideration the door this closes to safe and historic recreation in our nations treasured wilderness areas.