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Comments: To the Forest Service,

I am 36 years old and have been climbing for 25 years. I have climbed rock, ice and alpine terrain extensively in Joshua Tree, Yosemite, the Tetons, RMNP, the North Cascades and Denali, as well as many other designated wilderness areas. I also run the ice conditions tracking website www.neiceconditions.org.

I wholeheartedly support (most of) this proposal and encourage you to ignore the foolish and misguided naysayers.

There are two scenarios where you will get fixed anchors in the wilderness whether they are legal or not: 1. trade routes, by which I mean easily-accessed routes of a moderate grade, often guided, and 2. formations that do not allow walk-off descents. The proposed procedures clearly take those scenarios into account and recognize that in some cases, bolts are less damaging to the character of the wilderness than the messier fixed anchors that climbers might otherwise create and leave behind.

In a wilderness area, bolts should never open a climb that would not be possible without them-that sort of route construction very literally eliminates the "wild" from wilderness.

One non-trivial problem with your proposal: ice screws are not fixed gear. Not ever: they melt out, even in very cold places. Pitons can damage rock, but in modern climbing they are very rarely fixed, especially in winter climbing. Slings, meanwhile, are an essential part of any climbing outing-yes, sometimes they are left behind and become fixed, but requiring a permit to bring slings and ice screws will completely change the character of a day of ice climbing in the managed areas. It is easy to imagine rangers who, not knowing much about climbing, take this to mean that a climber cannot bring slings into the wilderness, or that ice screws will be left behind. Ice screws are not ever intentionally left behind, and most ice climbers these days drill "naked" V-threads for their descent, not even leaving a piece of cord in the hole.

In conclusion: the spirit of this proposal is correct, and bolts should continue to be mostly banned, but it is a little out of touch with how winter climbing works, and should be updated to reflect actual techniques.

Thanks for reading and for keeping our wilderness wild,
Jacon