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Comments: I urge you to reconsider the proposed guidance on climbing in National Forests. The decision to consider bolts as "installations" goes against decades of policy and practice, and will threaten the future of safe climbing in our national forests. While I care deeply about protecting our wilderness, I also know that it's not realistic or feasible for agencies with small staffs and small budgets to conduct an MRA for every bolt, new or historic, in wilderness. I worry that in practice, this new policy will cause an extreme backlog that will mean that bad bolts can't be replaced, which will be a huge safety risk and have cascading consequences for the public as well as park employees, first responders, etc.

I work as a climbing ranger in Yosemite National Park, and a huge portion of my job is to encourage good wilderness ethic while climbing the iconic, historic routes in our park. We talk to climbers every day about the best way to have a wilderness experience while keeping our impacts to a minimum. On huge routes like the ones on El Capitan, permanent fixed anchors are absolutely necessary to allow climbers to retreat safely if something goes wrong. Without those anchors, climbers retreating would have to leave behind huge amounts of gear that is not meant to weather the elements the way that bolts are. Additionally, that gear would be much more of an eyesore given that it's bulkier, more colorful, and easier to spot from afar, unlike the bolts, which are more or less camouflaged against the granite face. Additionally, a lack of anchor bolts equipped for rappelling would lead to a major increase of Search and Rescue incidents, since some people would be left without enough gear to retreat from high on the wall, or they wouldn't be able to retreat quickly and safely in the case of injury. This would tax the park service and put dozens of park employees into dangerous situations that would not be necessary if a small number of bolts were allowed to remain in place, as they have for more than 60 years now. This scenario is specific to Yosemite, but the same thing would play out in many national forests with fewer resources, where a timely rescue might not even be possible.

Overall, I think this new guidance hasn't been thought out in such a way that it could realistically be implemented in all national forests without a significant increase in funding. Who will enforce these bans in rural forests that already have trouble enforcing more important threats to the resource, like campfire bans and illegal off-roading? Climbing is an important part of our nation's history of engaging with wilderness, and the majority of climbers are going into the wilderness to have an experience that is very much in line with the wilderness act. A small amount of fixed anchors in wilderness enable to have these experiences safely, protecting the climbers as well as the first responders in these areas. MRAs are not meant to be used by the general public, and do not seem like an appropriate solution to the issue of bolts in wilderness. I urge you to reconsider this guidance, and come up with something that works for climbers and land agencies alike. Thank you.