

Data Submitted (UTC 11): 1/26/2024 7:38:08 PM

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Comments: I am a rock climber and I oppose this unnecessarily broad restriction on bolting in wilderness. I recognize that there may be legitimate reasons to restrict bolting in specific cases, but the policy as written is a solution in search of a problem. It would put unnecessary obstacles in the way of a legitimate, low impact, recreational use of wilderness. It would increase bureaucracy, destroy goodwill between climbers and land managers, and would even make climbing more dangerous.

Leave No Trace principles urge us to "travel and camp on durable surfaces", and climbing-quality exposed bedrock is the most durable surface we're likely to find in wilderness. The environmental impact of bolts on a climbing route is negligible relative to trampling from foot traffic at its base, which is in turn negligible relative to foot traffic on hiking trail networks-- and all of these pale in comparison to the impact of horseback riding. Piles of horse manure persist for longer than 24 hours, but I am not suggesting we designate them as "fixed installations" and I hope no one else is seriously considering it either. A myopic prohibition on bolts as "fixed installations" misses the bigger picture of minimizing overall impact by encouraging recreation that uses durable surfaces.

The policy misuses the concept of "clean climbing". The clean climbing movement arose from damage to rock caused by repeated adding and removal of pitons, which was turning classic routes in places like Yosemite into a series of pin scars. Bolts can be a lower-impact substitute for pitons and are a vital and necessary part of establishing clean climbing routes. Today's mainstream clean climbing ethics do not prohibit or discourage the use of bolts when they are required to adequately protect a route.

Climbers establishing first ascents must be given broad latitude to protect their safety as they see fit. First ascensionists should not have the possibility of prosecution in their mind when making a life-and-death decision. Establishing climbs on lead is the very essence of "unconfined recreation", and the (possibly unplanned) use of bolts is a vital tool for doing so safely.

I recognize that bolting must be regulated. My ask is that bolting be allowed by default, and prohibited only in specific cases where it causes problems. This is the current approach with hiking and horseback riding in wilderness, in keeping with the goal of "unconfined recreation". The policy instead takes the opposite approach of banning bolts by default unless a special exception is made. In doing so, it makes climbing less safe, upends decades of traditional use, and places climbers below other users in a hierarchy of worthiness.

I will be blunt: there is a segment of the outdoor community that looks down on climbing and other "extreme" outdoor recreational activities as not reverent enough, too strenuous, too high-adrenaline--in a word, too rad. The costs of this proposed policy are so great, and the benefits so small, that I can't help but suspect this elitist attitude played a role in its drafting. If this anti-rad faction is able to set policy, we and our public lands will all be poorer for it. Please reconsider this policy and treat bolted climbing as the sustainable, low-impact recreational land use it is.