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Comments: As a long-time climber and someone who has devoted his career to environmental protection (climate change), I am alarmed by the proposed changes.

Aging hardware makes climbing routes and descents less safe, which causes more accidents. Maintenance of existing anchors is very important to the safety of climbers and is labor intensive to perform. The proposed directives will make existing routes more hazardous by restricting maintenance of bolts and anchors.

Bolts and fixed rappel stations prevent resource degradation in delicate alpine environments. These types of planned descent routes not only avoid vegetation damage (rappelling from trees, scrambling through fragile sections of alpine plants, etc.) but also create descent options that reduce rockfall hazards, minimize chances of climbers getting ropes stuck on descents, and avoid dangerous situations and costly rescue operations. Bolted anchors tend to reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location on durable rock surfaces instead of wandering around to assess descent options.

Rappelling is frequently the primary cause of death in climbing accidents. When climbers rappel, they rely completely on an anchor, and anchor failure during rappelling often results in death. Prohibiting the maintenance of anchors or any placement of bolted anchors increases use of unreliable natural features that greatly increase the risk of anchor failure and impacts on vegetation.

On wilderness routes, bolts are already placed sparingly. In situations where no removable gear can be placed, bolts are placed to prevent catastrophic falls. Rappelling from some type of fixed anchors is often the only option for climbers to safely retreat from routes without SAR rescue, for example during inclement weather. Prohibiting these placements will lead to potential for more catastrophic falls in the wilderness and more SAR calls. Furthermore, SAR teams rely on fixed anchors to perform rescue operations. Not permitting fixed anchors will jeopardize SAR rescue operations and unnecessarily endanger the lives of rescuers.

Climbers have been responsibly recreating in the wilderness since before the passage of the Wilderness Act. The current fixed anchor policy requires the use of hand-drilling to install fixed anchors, which already significantly limits the quantity of fixed hardware (generally mechanical bolts) that can be installed. Fixed hardware is installed either to protect unprotectable faces and sections between crack systems or to enable safe rappel descent.

Many summits, towers, and walls require rappel descent. Camouflaged, bolted anchors with stainless steel bolts are the safest, most durable, and lowest-impact rappel anchors. The alternatives to bolted anchors are leaving slings or cords on vegetation, which is both unsightly and can damage sensitive vegetation over time, or slinging existing features such as flakes, chockstones, or other natural constrictions. These alternatives are much more visible as slings and cord are larger and have a greater visual profile, much less durable as they are susceptible to UV damage, and greatly increase the risk of accidents occurring when damaged cord is used that cannot be properly inspected.

Wilderness routes are typically approached in a ground-up style, which involves considerable adventure and self-reliance. The ground-up ethos aligns with maintaining a primitive and unconfined recreation quality of the wilderness. Imposing restrictions on the kind of hardware that can be left when establishing a new route, by definition, confines and restricts the recreation quality of the wilderness and can create very dangerous situations

for climbers attempting to climb new routes.

Climbing routes that follow continuous crack systems from start to finish and have walk-off descents that don't require rappelling are rare. Requiring permits for fixed hardware will essentially limit new routes to those that follow continuous crack systems to enable only the use of removable protection and don't require rappel descents. Again, there is no way to know if a bolt is required to protect a section of climbing until a route is climbed.

Climbers have a vested interest in preserving the primitive, unconfined, and solitary nature of the wilderness. We enjoy and explore these wild places and always try to minimize our impact. Our local and national stewardship organizations are continually educating climbers on how to reduce impact and protect wilderness climbing areas. Climbers have a small impact in wilderness areas compared to recreational users and hikers, who are present in larger numbers and are generally less educated and more likely to leave trash, go off trail, or otherwise fail to practice Leave-No-Trace principles.

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act - they are "substantially unnoticeable" to use the terminology of the Wilderness Act. Following existing, long-standing climbing policies that allow judicious use of fixed anchors for more than a half-century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

The language of the Wilderness Act of 1964 provides a de minimis exception to sparingly-placed fixed anchors. The Act states that a wilderness area "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." Camouflaged fixed anchors have a substantially unnoticeable impact on wilderness areas. They are not visible from ground-level and are generally invisible until they are encountered while climbing a route. They have no significant effect on the wilderness character, and prevent further impact by keeping climbers on specific descent rappel routes on solid rock. Ascent and descent routes with anchors are similar to established trails in wilderness areas that prevent impact like erosion and de-vegetation to surrounding areas.

Placing undue and unreasonable restrictions on climbing will not protect wilderness areas but will severely strain a largely beneficial and cooperative relationship between the climbing community and land management agencies. This will benefit neither climbers nor the USFS and NPS.