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Organization:

Title:

Comments: Hey USFS,

Voicing my opinions that I disagree with the re-interpretation of the wilderness act classifying bolting as "permanent installations" in the same category as roads, structures or dwellings. While they are left behind their impact is minimal and they are removeable and repairable.

From the Wilderness Act. "Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."  
Climbing and the use of bolts for protection is a historical and recreational use, and it predates the wilderness act in most designated wilderness areas (see the history of Warren Harding and Royal Robins climbing in areas like Yosemite.)

While I understand the logic behind classifying them as permanent installations, clearly the historical precedent, such as areas in Yosemite, and Director's Order 41 §7.2 CLEARLY CONTRADICTS THE NEW INTERPETATION. The order affirms that "climbing is a legitimate and appropriate use of wilderness" and that "the occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act,"

Please ensure the language of the proposal clearly states current anchors can be replaced as necessary by the climbing community to ensure safety, without requiring approval. An approval process to simply replace an old bolt with a new bolt should not be required and will lead to safety issues. The entire document is confusing to me if approval is required for anchor maintenance and replacement. REQUIRING APPROVAL FOR REPLACEMENT OF ANCHORS WILL SIGNIFICANTLY IMPACT THE SAFETY OF CLIMBING. I understand (but don't like) needing approval for placement of new anchors, but replacement of old anchors should be at the discretion of the climbing community in order to keep people safe.

Section 9 should clarify that "special use permits" may be issued for climbing but is not required and is up to the local FS organization.

Please consider changing the language of the following section to align with the current interpretation of the wilderness act per Director's Order 41 7.2 "climbing is an appropriate use of the wilderness... occasional placement of a fixed anchor for belay, rappel, or protection purposes does not violate the wilderness act."  
"12.Restrict or prohibit the placement or replacement of fixed anchors and fixed equipment in wilderness unless specifically authorized based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes (FSM 2355.32)."

^The historical use of climbing as a recreational activity 100% aligns with the wilderness act. This mandate would remove all adventure of climbing into the unknown if climbers have to fill out paperwork. Tt would be impossible to predict if bolts would be necessary and where they might be placed prior to attempting the climb.

Thank you