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Comments: 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.