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Comments: *IMPORTANT SAFETY CONCERNS with new section 2355 guidelines*

I am a climber that lives and climbs mostly in the Santa Catalina mountains outside of Tucson, Arizona. This beautiful area is a mixture of wilderness and non-wilderness land managed by the USFS. I am also a volunteer anchor/bolt replacer - this means that I spend my own time and resources to carefully replace and update aging and unsafe hardware to provide for a safe and sustainable way to recreate. These bolts were often installed decades ago and are a critical and irreplicable component to safely ascending and descending rock faces. I have spent thousands dollars and many hundreds of hours carefully removing old, rusty, unsafe, and unsightly bolts. I replace them with bolts that conform to our community's safety standards and expectations - these bolts are discrete (sometimes camouflaged), safe, long lasting (expected to last more than a century in our climate), and often can be replaced by re-using the same original hole drilled - which allows this to have no additional impact on our shared resources. Also, it is worth noting that this whole process is also done without the use of power tools in designated wilderness - in full compliance with existing rules. That is a-lot of elbow grease!

This is a time consuming and highly skilled process and I have many concerns about the continued replacement of anchors, which contributes to climbers safe passage up and down rock faces, in the future if this project/draft language is adopted as policy.

I am afraid that myself and future generations of climbers will be forced to rely on unsafe and degrading hardware because USFS cannot or will not allow the replacement of already in-situ bolts/hardware. This would likely be bogged down in endless red-tape, biased MRA processes, and never enacted as funding will likely never materialize for even the most needed replacements.

I strongly oppose this project/draft legislation as it is currently written. It will endanger the freedom of climbing and the bodily safety of current and future climbers.