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Comments: I am a frequent visitor to Rocky Mountain National Park, and in my experience, it is the high volume of hikers in RMNP that most deteriorate the wilderness character of the area, not the climbers or their bolts. The trails near Bear Lake feel more like one is walking through an amusement park more than a wilderness area. In comparison to the hikers, the number of climbers and our collective impact is insignificant. Why are climbers being singled out? Climbing is a growing sport to be sure, but matter how popular climbing gets, it will never produce anything close to the crowds of hikers you see at RMNP. Why go after bolts? The bolts themselves do not impact the wilderness character of an area, the people do.

My preference is to leave the rules as they are now, where no power tools are allowed in wilderness areas but existing routes can be maintained and new routes can be developed without review. Bolts are very laborious to place by hand, and this naturally limits the number of bolts. I think this is a reasonable approach that naturally limits route development and doesn't create an onerous and costly administrative review process. If the USFS wishes to limit the number of people in an area, reduce the number of reservations or permits issued.

All that said, it seems that the USFS is committed to creating a review process. My ask is that the idea that "climbing is a legitimate and appropriate use of wilderness" is taken seriously. The review process should ensure that wilderness principles are abided by and that the needs of climbers are met. The administrators of the review process should be seasoned climbers who are committed to wilderness principles and to climbing. These people are not hard to find. Climbers are environmentalists by nature and believe in wilderness principles just as much as the USFS. You can collaborate us to create a process that works for both the NPS and climbers. We have organizations like the American Alpine Club and Access Fund that you can work with.

Use the example provided by the Flatirons Climbing Council (FCC). This council, in collaboration with the City of Boulder's Open Space and Mountain Parks Department, regulates the development of climbing routes in the Boulder Flatirons. The FCC is a group of climbers who administers a formalizes review process for approving a small number of new routes in the area. This is a highly effective process that minimizes the impact of new routes and ensures that any new climbing routes are high-quality and worthwhile. The Flatirons is a wonderful place to climb that has incredible routes and a remote, wild feel, despite being so close to population centers. This should be the model for developing climbing in a responsible and sustainable way.

Thank you for considering my comments. I have given this topic significant thought in writing this and I have seriously considered the point of view of the USFS. I trust that this favor will be returned in reviewing my comments and those of my fellow climbers.

Brian