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Comments:

It is clear to me that the legal mandates and the general spirit of wilderness prohibit activities such as bolting, and I urge your agency to take the proper and legal steps necessary to prohibit through the CFRs, and discourage through active management, this practice. I think the legal arguments for this are clear, but let me give you the perspective of an old climber who spent many decades exploring both wilderness and non-wilderness areas administered by federal agencies.

I began rock climbing when piton use was still common; bolts were rare and required un-powered hand drilling, an awkward and daunting task. Modern chocks were just coming into use. "Friends" and other camming-type methods of protection soon evolved, and the use of pitons dropped off to nearly nothing. Bolting also seemed to nearly end. Climbing changed: it became less damaging to the rock, and it became safer. The sport progressed and seemingly "impossible" routes became possible for many. Nobody felt that they "needed bolts" to climb.

As the years went by, gear improved, safety improved, and climbing improved. Then came relatively lightweight power drills. Suddenly bolting was everywhere-- although it was completely unnecessary. Bolting allows people to do routes more quickly, with less effort, and with less skill. I can think of no area where it allows climbing to occur that would otherwise be impossible; specific routes, yes, but not larger areas or summits. Bolting is not a safety issue, and it is not an access issue. It is merely a matter of ease and convenience.

Bolting allows people to approach wilderness on their own terms instead of nature's terms. It allows people to be a little bit lazier, and a little bit hastier. It allows them to take risks where they might otherwise take a slightly different line or route. None of this is appropriate to a wilderness setting. Climbing gyms and non-wilderness climbing areas abound all across the country; those who choose to climb as a race against the stopwatch or otherwise engage in sport climbing have tens of thousands of non-wilderness venues where they can pursue that aspect of the sport. They do not need to ruin the wilderness and ruin traditional climbing areas just to add a few more locations to their bragging list.

There is no material difference between installing a permanent bolt and installing a permanent ladder. Or installing a permanent cable, or a handrail. It's just a few degrees of difference away from installing a snack bar and espresso stand. Permanent installations and development of infrastructure strictly for a visitor's ease and convenience are contrary to the 1964 Wilderness Act and are contrary to the basic attributes of wilderness.

Bolting allows climbers to violate the legal mandates of wilderness, and it allows them to cheat the mountain or face that they are climbing. They are no longer engaging with the wilderness, any more than someone paddling behind a dam is engaging with a wild river. They are taming and trammeling the wilderness with technology. None of this is necessary for the use and enjoyment of the area as wilderness, none of it is appropriate, and none of it can be undone.

There is also no material difference between drilling and bolting rock versus spray painting it with graffiti. Except of course, that paint will eventually wear away, or could be cleaned. A drilled rock face will never be repaired. At least within the span of a dozen human lifetimes, a bolted rock face has been as permanently altered by that installation as it would be if the installation were a radio tower, a stairway, or a sleeping platform. Or a snack bar. All of this is contrary to the legal mandates of wilderness. Contrary to the responsibilities of your agency.

Please do the right thing. Don't discard the idea of wilderness simply to please a small number of people at the expense of others, and at the expense of permanently changing thousands of climbing routes only to make the

climbing less challenging, less natural, and simply less-- less than wilderness.