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Title:

Comments: Using the Wilderness Act 16 U.S.C. 1133(c) as an umbrella to regulate rock climbing is an overreach. The term "installations" is too vague. Fixed anchors and bolts, which go unnoticed by most recreational users and provide an enormous increase in safety when rock climbing, are not the same as (for example) a radio tower or geological monitoring station. They are limited to areas that are mainly visited by climbers and the climbing community has taken extreme care to limit permanent hardware and even color bolts to blend in with rock.

Bolts protect against big falls, ground falls, serious injury, and death. Climbing has grown significantly in the last 5-10 years, sport climbing especially. This form of rock climbing is often the entry level available to most new climbers, requires the use of permanent bolts, and is often the first step taken before embarking on traditional (trad) climbing, which places removable gear. Restricting bolts could lead to increased injuries or deaths as new climbers attempt trad climbs beyond their skill level. Even trad climbing often uses fixed bolts to increase safety and access in areas on rock walls that will not accept removable gear. This is often called "mixed" climbing. Trad climbers also often use fixed anchor bolts at strategic intervals along a rock wall to belay their partners or rappel off of a climb safely. These bolts greatly reduce risk of serious injury and death, and provide a safe way to descend.

This draft needs to be revised to reflect the concerns and perspectives of the community that it is directly affecting. The climbing community has taken great strides over the past several decades to create and maintain a healthy relationship with the national park service and I want to see that continue. The scale of oversight proposed by the draft is immense and seemingly unrealized by those proposing it. It reads as a desire to reduce safe access to an activity that has already existed for decades and created its own ethics for responsible recreation. Please revise.