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Comments: I believe that it is time to have national guidance on bolting and am glad it is being addressed, but as this directive stands it is not realistic nor feasible. The Wilderness Act protects the wilderness, but it also is written in a way that depicts the wilderness as something to be enjoyed by humans, not set aside to never be touched. Technically yes bolts are an installation, but they are the minimum means of access. Just like certain trails and bridges are approved for the wilderness, certain bolts should be too. In this sense, MRAs are a good idea, but there's a few significant issues.

- MRA's are a paperwork heavy and confusing task. Significant funding and personal will be needed to address the MRA requests. Currently a request for an MRA for bolts could never be responded to or never adequately looked at even if it falls within the criteria where it should be approved. Is there a way to address this in reverse; instead of requiring an MRA for any bolt, have an application sent in to install the bolt and have it assumed to be accepted unless it is looked at and there is a reason to deny it? This would allow those who want the bolts to be the ones to do the paperwork to officially request them, but also give the land managers and opportunity to review and accept or reject the request if there are concerns.

- All existing bolts should not need an MRA unless requested to be removed (instead of needing one to remain). Any existing bolts can be assumed to have been placed for a reason, removing these often just invites a new set of bolts to be placed which is more damage than if they initial set was left.

- MRA's and their approval are meant to be objective, but in reality, they are dependent on whoever was hired in a certain position. If an MRA is required, will there be any more guidance to the federal employees for what grounds are appropriate to accept or reject it? I have personally experienced a case where the wilderness manager has never approved bolts in an area despite very substantial recreation and research potential that other wilderness managers would have approved bolts for.

- Climbing is inherently a counter-culture sport and a blanket ban without an easier permit system would only make climbers hide their activities from the land managers making it harder to properly manage.

- If the goal is to protect the wilderness, bolts are frequently the best way to do so. Properly installed bolts are significantly less impact than sketchy alternative rappel stations and climber trodden trails. Although it may seem too in the weeds, I think it is worthwhile to differentiate anchor bolts which are a means to limit impact after a route has been accessed/travelled, from aid climbing/grid bolting where bolts are used as the means of access. Similarly, some rappel bolts to access an area actually protect the nature below it from being damaged by travel and make it much safer and possible to access, preventing SAR callouts.

- This guidance impacts more than climbers: highlining, caving, canyoneering, ice climbing, mountaineering, etc. Not all of these activities use bolts in the same manner and will add confusion to the MRA process and could easily have a valid request for bolts be rejected simply by lack of understanding from those reviewing the request. Although there have been cases where grid bolting and altering rock for route development have taken place, considering the popularity of climbing it should be noted that climbers tend to keep themselves in check and typically minimize their impact. I still think there should be a bolting guidance, just that a blanket ban without a difficult permit seems an extreme response for the considerably low level of impact.