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Comments: Climbing outdoors is my favorite activity. For me, climbing is the most fulfilling type of recreation due to the problem solving and commitment required, the sense of accomplishment afterward, the unique locations and vistas climbers can access and the appreciation for historic ascents I've developed. In Idaho, most of the climbing I do is on National Forest land, and it almost always involves using fixed anchors for descending. Most routes involve some protection bolts as well, where there are no natural features that will accept traditional removable gear. I urge the Agency to support climbing in Wilderness and Non-wilderness areas as a legitimate recreational pursuit, including recognizing that fixed hardware is a key component of safe climbing routes. Modern responsible climbing ethics are certainly no more destructive to nature than other types of recreation supported In Wilderness areas, like horseback riding for example. A common-sense policy authorizing fixed hardware on new routes where required for safe climbing should be developed. I have experience with the case-by-case new route approval system at the City of Rocks, where permits can take a year to be approved and require that the potential developer make additional preliminary trips to identify as much about the route as possible. Unfortunately, many routes cannot be attempted without some fixed hardware to enable closer scouting, which adds more unknown variables to the permit. The City of Rocks is a small area with a relatively large number of employees, and the rock climbing is near the road. Trying to implement a similar approval process across all land managed by the Agency would make the development of new climbing routes nearly impossible, as most climbing areas are much less accessible than at the City of Rocks, with proportionally much fewer employees available for reviewing permits, and an extremely small chance that the reviewing employee would be familiar with the specific rock in question.

I spend hundreds of hours a year volunteering my time to replace the dangerous, corroded hardware on historic routes. In the last decade, rebolting technology has improved considerably, so it is very often possible to remove the old hardware completely and install the replacement bolts in the same location. It is imperative that hole-for-hole bolt replacement not be delayed by an approval process that would cause unnecessary danger to climbers using bolts near the end of their lifespan. It is not unusual for some bolts on a cliff to require urgent replacement when others nearby will be fine for decades longer, due to chemical processes, rockfall or microclimates causing rapid damage. For example, I recently replaced some bolts on Slick Rock in the Payette National Forest. These bolts were near the top of a 1200' route, where they are the only available protection and where retreating downward is extremely difficult. Although the hardware was only installed about 15 years ago so wouldn't normally be considered for replacement, the ice sheet that formed on the rock in the winter had melted in an unusual way and put an immense shear force on the hangers as it slid down. Attached is a picture of the hanger that had been folded flat and cracked by the ice. Luckily, under the current status of rebolting in National Forests, I was able to replace the hardware before too many climbers were exposed to the danger. It is rarely so obvious when a bolt is compromised, so it's best to ensure the timely replacement of all old hardware and not add additional hurdles.