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Comments: I have read over the proposed directives that the NFS is recommending be implemented. On the surface, the recommendations sound reasonable, particularly in designated Wilderness areas. As a rock / ice / mountain climber, caving and canyoneer of 30+ years now, I have been on 1000's of trips and experienced areas were untouched by man (until we got there, especially in caves), to areas that have been aesthetically destroyed by overuse, litter, and even deliberate vandalism. I totally understand the need to regulate use in such a way to prevent serious degradation of the environment, but I also recognize that fixed anchors are often required in technical terrain to make progression and or retreat possible. I have climbed many mountains and multi-pitch rock routes that did not have / need any fixed gear, and thanks to "walk offs" they also did not need any fixed gear to get back down. Routes such as East Buttress of Mt Whitney or classic rock line Olive Oil (Red Rock, NV) are examples of such. However, the vast majority of rock climbs I have done need some fixed anchors to get back down, and many need some fixed anchors for safe progression as the placement of removable rock protection can be too far apart. Grand Teton Owens Spalding or Exum Ridge, or the mega classics Sun Ribbon Arete or Epinephrine (Red Rock, NV) are examples of such. And some routes I have done are bolt intensive such as The Nose El Capitan or Crimson Chrysalis (Red Rock, NV). All these Wilderness area routes are just a few examples of the 1000's of such routes all over the country that have existed for decades, many of which predate the Wilderness Act itself.

My main concern with the implementation of the proposed directives is exactly what happened at Red Rock, NV (BLM area) around the year 2000. At first, the management wanted a full ban on all fixed anchors used anywhere. There was massive pushback, and after many battles (even including a congressional hearing) the total fixed anchor ban was not implemented, but all bolts had to be permitted before installation. The problem was the BLM management would never issue permit for installing any new bolts or even bolt replacement. Thus, for over 20 years now, new routes at Red Rock, NV have effectively been banned and bolt replacement is done "under the RADAR". Given what I read in the proposal about MRAs, permitting for bolt placement, and the total lack of funding to administer these proposed directives, I fear what happened at Red Rock, NV will be now a nationwide de-facto policy.

And it gets worse. I have done plenty of rock climbing first ascents, canyoneering first descents and explored virgin caves. For most of these explorations, what is needed for fixed anchors is not known until the trip is underway. It is completely unreasonable to require pre-permitting the bolts installations, since we don't know if we will need any bolts, or if we do place some how many or where they will be installed until we get there. In caves, we assume we will need bolts, and we often do. For canyons, often easily removable anchors (webbing around a tree, bush, big rock, or build a rock pile) works. Also in canyons, "ghosting" techniques are widely used these days and leave nothing manmade behind. However, ghosting is not always a viable option and it's sketchy to downright dangerous not to use bolts in some case. I note that in some areas with total bolting bans (examples: Death Valley NP or Glen Canyon NRA) bolts are sometimes installed illegally because all the other canyoneering tricks are not sufficient. I even had a friend die in Death Valley indirectly because of the bolting ban. He fell over a drop approaching a dangerous anchor location when the rock slid under his feet. Whereas if a couple bolts were installed right nearby, he would have not needed to expose himself to such a high-risk anchor. And for swift water canyons, often bolts are the only viable anchor, as the position of the anchor is critical to a safe descent and the "natural" anchors often don't exist or are not in the correct position.

Again, my concern is that the policy implementation will mean that bolting and even other fixed anchor installation will be grossly burdensome, excessively time consuming, and or effectively banned by not having quick, easy and practical ways to permit fixed anchor installation.