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Comments: This is a deeply flawed proposal and needs to be rejected.

As a life-long climber, guide, route developer and climbing instructor I am telling you from a place of deep experience with wilderness climbing that this proposal will be impossible to enforce, expensive to administer and will not solve whatever perceived issues there are with climbing as a land use practice.

First, placing bolts in the same category as roads and buildings is incorrect. Bolts are very hard to find, even if you are looking for them, and are almost always invisible from the ground. They don't have any environmental impact.

Second, the call to perform a minimum needs analysis for every existing anchor in the wilderness is incredible!! Do you have ANY idea how much time/money/effort that would take?? These anchors are, by design, very very difficult to access, and to make a determination about the necessity of each one would require someone who is a very skilled climber to make that determination. It is often impossible to tell if a bolt is needed without actually climbing the route. Also, how are you even going to attempt to find them all?? I personally have established a half-dozen routes, in the wilderness, with fixed anchors, that are not published anywhere and are only known to a handful of climbers within our tight knit community. Guess where they are! I'll tell you, waaaaay up a remote cliff, not bothering anybody.

I wish I could write all I feel about this, but know that you are headed for disaster if you do not dramatically reconsider this. You will only serve to bankrupt the program and anger/alienate climbers, who will just continue to go on doing what we've always done.