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Comments: I have been a board member of multiple local climbing organizations (LCOs) that have successfully worked with private land owners, the Forest Service and the U.S. Fish and Wildlife Service to govern and maintain sustainable bolting practices in lands at the private, state, and federal levels for over a decade. Climbers have banded together to find the best and least impactful techniques to replace old bolts, pitons, slings, chains, cables and other fixed gear at climbing areas around the world.

Climbers have proven they can be strong and impactful land stewards by having a hands on approach to maintain lands by providing volunteer support to pickup trash, rebuild trail systems and structures, install trash containers, remove graffiti, and provide other activities that help the poorly funded and exceedingly understaffed State and Federal land managers.

These new proposed directives are worded in a very unique way. The wording is positive in wanting to provide guidance to the land owners to ensure a positive visitor experience while protecting the lands for future generations. But the key phrases are "as funding and resources allow,". We all know that the USFW and FS are incredibly under-funded and under-staffed. These directives of making existing fixed hardware for climbing prohibited until their impact can be studied, ensures that all most all fixed hardware on public lands will never have a Minimum Requirements Analysis executed, thereby making them prohibited forever. This has the impact of telling the public that they are not wanted on public lands.

These directives put more work on the Federal and State agencies, work that will never be able to be completed due to the lack of resources and priorities. It would be much better to put the responsibilities and work onto the LCOs that have a general love of the land and have the manpower and drive to accomplish the land maintenance and ensure that sustainable bolting practices are followed.