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Comments: First I want to say that recognizing climbing as an appropriate use of forest service lands is a huge step forward and a great part of this proposal.

Overall things look great, except for the part about fixed anchors and fixed equipment being installations and so subject to lengthy review processes. Given how many climbing areas are still being discovered and how it's not possible to evaluate the need for fixed protection before climbing something it doesn't seem possible to do a thorough analysis upfront ahead of developing a route. So this is never going to work. Either new climbing routes will not be explored or they will be done illegally or they will be done unsafely which will lead to more accidents and potentially loss of life.

For existing previously developed routes requiring permits / authorization for replacing fixed equipment also seems very dangerous. Often the condition of the fixed equipment isn't known until you are there and need to retreat. Disallowing this will only lead to people taking riskier things like using fixed equipment that's not in great condition and not replacing it (specially when it comes to sun-bleached slings this has lead to fatalities in the past, but the same can apply to bolts).

Please reconsider. I understand that in already developed climbing areas that see a lot of traffic the management of anchor equipment probably needs some process, but on low traffic areas or areas still being discovered this will lead to either illegal or unsafe behavior.