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Comments: I am writing regarding the proposal to require climbing anchors of various kinds to be permitted installations. While I understand the intent of the protection of natural conditions, which I am all for generally, a climbing anchor is a critical piece of safety equipment and would limit to utilization of natural places in ways they have historically been utilized. The climbing community is generally very good at self regulating and ensuring best principles are applied in the building of anchors.

Again while I understand the intent I think requiring a permit and as a "permanent installation" is a bit of square peg in a round hole approach. I understand the need for this level of permit for a larger scale piece of infrastructure. Climbing anchors are unobtrusive and generate minimal footprint/area of impact.

It would also make the maintenance of existing anchors confusing and complex. Anchors needs to be maintained as a key piece of safety equipment.

I think a new or revised approach is required which allows anchors existing and new to be utilized generally and if there are specific problem areas that need to be addressed those can require additional requirements. There are several existing permit structures like this that could be used as a model for permitting when it is explicitly required. For example climbing prohibitions due to raptor nesting are a time and area specific control. Not all climbs are closed all year cause the potential for an issue does not exist in all places at all times.

I also think the implementation of such a permit required for everything approach would be very time consuming for various agencies which are typically stretched thin as it is. I think it is the USFS best interest to limit direct management only in those places where it is explicitly needed or causing unacceptable impacts. Also I think it would be a difficult to enforce this policy as written and not end up in a defacto state of enforcement in specific areas of concern.

I hope that situations that require intervention or permitting would not occur but I also understand that as a land management agency it would be appropriate to have some kind of regulatory tool to allow better management in areas where impacts may be unacceptable or of special concern.

Finally there is the issue of potentially confusing enforcement between different land management unit types (wilderness, national forests etc) especially given the mix of existing routes that are present in the landscape.

Thank you.