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Comments: This is the first time I have ever submitted comments to an NPS proposal, and I write today to say that the "minimum requirements analysis" section of this proposal is completely wrongheaded, unsafe, and contrary to several generations of well-considered, thoughtful self-management by the climbing community.

Climbers have been bolting climbs and managing the replacement of old, rusted, or unsafe anchors and fixed gear for 70 years. Why reverse that now? A "minimum requirements analysis" as outlined in the proposal would effectively erase decades of deeply ingrained culture that is fundamental to climbing safety, route development, and the growth of the sport. Erecting this kind of procedure effectively puts new route development and existing route upkeep into the hands of a government agency, where it DOES NOT BELONG.

It's not just a matter of erasing climbing culture-moving forward on this proposal will actually make climbing LESS SAFE, because the procedure involved will effectively delay new route development (thus increasing crowding on existing routes), delay the replacement of bolts on existing routes (thus increasing the amount of time climbers are climbing on rusted or outdated gear), as well as impede the addition of new bolts to existing routes (thus increasing risk).

Climbing has managed to come this far without a proposal like this-why change it now? There is no good reason.