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Comments: As a climber, former rock guide, and conservationist, I oppose the proposed directives. While I agree that the community would benefit from a unified approach to fixed gear, the proposals as written will primarily reduce safety. I foresee increased danger for the following reasons:

- Old, unsafe gear is less likely to be replaced, and more likely to be used until it fails (which may result in deaths, as we have seen in recent years as the oldest climbing bolts reach the end of their safe lifespans).
- Making the placement and maintenance of fixed gear illegal (or burdensomely regulated) will prevent official groups like the ASCA, Access Fund, and local coalitions from doing this work, which will instead be done by individuals who likely have less expertise. In addition to being less safe, this is likely to mean that fixed gear is added more haphazardly -- in places where the local branch of the Access Fund has guidelines on bolts and other fixed gear, the community generally trusts their judgement and allows those groups to do their jobs.
- Climbing is only getting more popular, and people will continue to climb existing and new routes, whether they are permitted to do so in a safe style or not. The cutting edge climbers who develop a hard new route may be able to do so safely with minimal fixed gear, but the many who will attempt to follow the route later will likely be less safe if the first ascensionists avoid placing fixed gear to avoid the paperwork or to stay within the law. Those elite climbers should be encouraged to make their new routes safe for the climbers who will inevitably follow them, not to climb the routes with the least amount of gear they think they can get away with.