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Comments: I have been using federal lands for climbing and other recreation for upwards of 20 years. I have watched the climbing community change much in this time, and have been an active volunteer for maintaining these places for much of that time. This proposed permit process, while perhaps well-meaning, is very misguided and will have a negative impact on both climber safety and environmental impact to the land that we recreate on.

Fixed anchors are important for safety and for conservation. The existing ban on power drills in wilderness areas and many other lands is enough to curb an excessive or unnecessary bolt placement: a single anchor can take 2-3 hours to place with a hand drill, meaning that climbers generally only place them when absolutely necessary. Additionally, much anchor placement is anchor replacement. A permit process to replace an old, worn anchor would mean that climbers would rely on unsafe bolts until a lengthy permit process allows the installation of newer equipment, or possibly even denies the upgrade entirely. Importantly, the ground-up nature of climbing means that typically, users will not even know the fixed anchor is old and unsafe until they have climbed up to it, meaning their only choice is to either attached themselves to the unsafe anchor, or to attach themselves to nothing at all. When establishing new routes, climbers generally do not know when a fixed placement is needed, until they are in the air facing it. Getting a permit before attempting to establish a new route is often therefore impossible. So, when prohibited from placing fixed gear on routes as they are being established, it only serves to increase the danger of the route, not just for the first ascensionist, but for everyone that climbs later: once a route is established with no bolts for safety, then those routes rarely have bolts added afterwards.

In addition to safety, fixed anchors are often used to prevent impact to trees and rock structures and vegetation surrounding the cliffs. The alternative to bolts at the tops of climbs is not "people don't climb the route" The alternative to bolts at the tops of climbs is trying slings and ropes directly to vegetation or rock features adjacent to the climb. which involves walking around on the soil at the top, which promotes erosion, or anchoring directly to trees, which, if done frequently enough, can eventually kill the tree. A small bolt at the top of the cliff is barely noticeable from the ground, and lasts for decades, whereas the alternate, slings around trees, can be unsightly for other users, like hikers, and need to be replaced or reinforced every couple of years, generating trash and a situation where the climbers are not certain as to the sling's strength and integrity. Rescues, which will occur more often if climbers have this hurdle to protecting their climbs, are also extremely impactful to local environments, and detract public resources from other areas.

Climbers have managed to self-police the placement of fixed anchors for as long as there has been climbing, with some limited number of sensitive areas adding their own regulation as needed, often with the support of the climbing community. This proposed process is worse than solving a problem that does not exist: it's creating a safety problem for everyone that uses these areas, creating animosity between the climbing community and the land managers, and will result in more environmental impact to climbing areas.

I urge you, please do not adopt this policy.