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Comments:

Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes. Climbing has taken off in popularity and the bolt prohibition will inevitably lead to more people climbing on unbolted routes or routes with dangerous old hardware. When inexperienced climbers get on unsafe routes, it's not a stretch to imagine what can happen. In a sport where the entire purpose of the activity is to defy gravity and death, safe use of the fixed anchors that reward that defiance is the difference between life and a great story, or death and another tragedy in the news.

Every sport crag I have climbed at has been bolted safely and discreetly (sometimes to the point where I can't even see the bolts), and every climber I meet there is keen to leave the crag better than they found it. The safety and impact concerns are much better geared towards regulating dispersed camping and reckless OHV use that results in heavy impact to sensitive ground and mass littering.

A more effective way to reduce the impact of climbing is to require hardware to be camouflaged to the rock color and provide amenities such as a trash can and wag bags at popular climbing trailheads.