

I'm writing to comment on proposed FSM 2355. I'm a climber who contributes to my local climbing organization and to the American Safe Climbing Association. My background is in philosophy and technical language, so I read regulatory text closely; I have also recently taken up crag stewardship, which is what brings me here.

Not long ago I joined a rebolting clinic and helped replace the hardware on a route. We moved one bolt into more solid rock, swapped outdated wedge bolts for durable glue-in anchors, and patched the old holes so they can no longer be seen. It is careful, ordinary work, and it showed me that a fixed anchor is often the gentler choice on the land. A bolted rappel station, for one, spares the tree that climbers would otherwise sling and wear.

The directive is a real step forward. It recognizes that "climbing is an appropriate use of NFS lands" (2355.03), and it treats fixed anchors, when limited in scope, as something other than "installations" under Section 4(c) of the Wilderness Act (2355.05). Both are welcome, and climbers rejoice.

My comment concerns one thread that runs through the draft: it ties the placement and replacement of fixed anchors to climbing management plans. I'd ask the Service to loosen that tie for at least one narrow case: the routine replacement of fixed anchors already in the rock. I am not asking that new routes, heavily bolted climbing, or areas with known resource conflicts skip planning when the relevant authority decides a plan is needed. Unless a plan says otherwise, the replacement of fixed anchors should continue as appropriate for preventative maintenance and to reduce adverse resource impacts.

The reason comes from the directive itself. An anchor is there "for the purpose of protecting a climber from a fall" (2355.05), and the directive lists among its hazards the "lack of maintenance of fixed anchors and fixed equipment" (2355.1). Replacing worn or outdated hardware is simply the safety work the directive already accepts as the valid purpose of fixed anchors. Yet a climbing management plan is a tool the directive says to develop "as necessary and as funding and resources allow" (2355.03), for the few areas with "adverse resource impacts or use conflicts" (2355.21). Few such plans exist, and they may take years to write. To make routine replacement wait for a climbing management plan holds back safety work where a plan has not been written. Even worse, it would ask the agency, in effect, to spend its limited resources on plans it has judged unnecessary. Congress pointed the other way: the directive itself grants that plans "shall include direction addressing the continued use and maintenance of... fixed anchors in existence as of January 4, 2025" (2355.32, EXPLORE Act §122). The upkeep of existing hardware was meant to continue, not to pause.

With that in mind, I'd ask for three small changes, each in the directive's own words.

1. Say plainly that routine replacement of existing anchors does not require a plan. The non-wilderness section nearly says this already: replacement is "appropriate where... neither restricted nor prohibited in a climbing management plan" (2355.31). Where no plan exists, no plan restricts the routine replacement of fixed anchors.

- 2355.03 — after "...when allowed by a land management plan or climbing management plan," add: "The routine replacement of existing fixed anchors and fixed equipment is allowed without a climbing management plan, so long as it is not restricted or prohibited by an applicable plan and the hardware is replaced in locations that reduce adverse resource impacts."
- 2355.31 — add: "The absence of a climbing management plan does not, by itself, restrict or prohibit the routine replacement of existing fixed anchors and fixed equipment."
- 2355.32 — after "the applicable climbing management plan," add "where one exists," and: "Consistent with Section 122 of the EXPLORE Act, the continued use and maintenance of recreational climbing routes and fixed anchors in existence as of January 4, 2025, including routine replacement of that hardware, does not depend on the completion of a climbing management plan."

2. Say what "replacement" means. The directive defines "Fixed Anchor" and "Temporary Anchor" but never "replacement," so each forest reads it its own way. Replacing a worn, outdated bolt with an identical obsolete one does not answer the hazard; a sound modern piece does, and it stays "limited in size, scope, and function" (2355.05).

- 2355.05 — add a definition: "Replacement. The substitution of a new fixed anchor or fixed equipment for existing hardware serving the same function. Replacement includes upgrading to hardware that meets current safety standards, substituting an adhesive (glue-in) anchor for a mechanical one, and modestly relocating an anchor into sound rock where the original placement sits in poor or deteriorating rock, so long as it remains limited in size, scope, and function and reduces adverse resource impacts."

3. Outside wilderness, do not tie the drill to a plan. In wilderness the Wilderness Act rightly governs motorized drills (2355.32), and I do not ask to change that. Outside wilderness there is no such bar, yet 2355.31 still conditions the motorized drill on a plan that may not exist.

- 2355.31 — replace "Motorized rock drills may be used to the extent that they are consistent with the applicable climbing management plan" with: "Motorized rock drills may be used to place or replace fixed anchors and fixed equipment. The absence of a climbing management plan does not restrict their use; where a plan applies, motorized drill use is subject to it."

A few smaller clarifications would also help, offered briefly:

- 2355.31 — "Do not allow redundant or otherwise unnecessary placement or replacement..." reads against a basic safety practice. Redundancy is deliberate: belay, rappel, and lowering anchors are built with more than one point for the purpose of safety, so that the failure of one point does not result in death or injury to the climber. Suggested: "Do not allow unnecessary placement or replacement of fixed anchors and fixed equipment. Redundancy at belay, rappel, and lowering anchors is an appropriate safety practice within the limited scope and function of fixed anchors."
- 2355.32 — the sentence allowing anchors "in areas where impacts on the rock face are occurring due to the use of rock hammers to chip handholds or footholds into the rock" is hard to follow and sits oddly against the directive's own ban on chipping. Suggested: remove it; or, if it means allowing bolts to protect blank sections on aid routes, say that plainly.
- 2355.32 — please make clear that the restriction on "glue, epoxy, or other fixatives for handholds and footholds" reaches the shaping of holds, not adhesive (glue-in) anchors, which are a standard, durable type of fixed anchor.

Each change asks only that the routine upkeep of existing anchors keep pace with the safety the directive already values, without waiting for plans the Service reserves for harder cases. Thank you for considering them.

July 20, 2026

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