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First name: Tom

Last name: Addison

Organization:

Title:

Comments: My name is Tom Addison, and I have been a climber for 47 years, and have climbed in 37 of our states. I have climbed in dozens of national forests, in many states across this country, and truly appreciate the ability to passively recreate on our public land. Very few of the national forests I have climbed in currently have Climbing Management Plans (CMP), and establishing such plans will take time. Yet, there are antiquated unsafe climbing anchors that need to be replaced in these forests. I in fact have replaced hundreds of such old dilapidated bolts, and this is important for climber safety. The draft policy currently to me seems to maybe require a CMP prior to doing such critical replacement, and this must be clarified to allow replacement regardless of whether a CMP has been adopted or not.

Furthermore, bolt replacement of outdated hardware should allow for replacement of hardware meeting today's safety standards. For example, in my early climbing career in 1980, I placed mechanical bolts we call 'buttonheads', manufactured by the Rawl Corporation. These split shaft anchors were 1/4" in diameter and 1.5" in length, and were plated steel. Because of metal fatigue, and corrosion, though safe when placed, such buttonheads are no longer strong enough to protect a climber's fall. The replacement of such hardware such not be identical now very outmoded hardware, but hardware that meets today's standards for strength, durability, and longevity.

Furthermore, it is critical to allow replacement and placement in non-wilderness areas to use the appropriate tool: the rotary hammer drill. Bolt replacement by hand is extremely arduous, and I speak from experience. To not allow use of the appropriate tool creates long-term safety hazards. Holes drilled by hand are typically not as round, nor typically not of sufficient diameter or length to provide an anchor with the durability and safety required, both creating a long term safety hazard and a need for future replacement yet again.

The language that disallows the use of adhesives without prior approval is a mistake. There are some rock types that require adhesives (what we climbers call glue-in bolts) versus mechanical bolts from a safety and durability perspective. The language disallowing adhesives should be struck.

Section 2335.32 should be deleted. Climbers do not engage in "the use of rock hammers to create handholds or footholds into the rock". This is simply not the case, so the language should be struck since it implies something false.

The guidance should generally standardize policies across national forest units, to avoid major discrepancies between units. There should be a general template that can be used throughout the entire NFS system.

Generally, the guidance should reduce the burden on both the local forest managers and the local climbers, and a generalized template would do just this.

Thanks for your consideration of my comments. Climbing is an appropriate and low-impact activity on our public lands.