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First name: Fred

Last name: AmRhein

Organization:

Title:

Comments: I have been involved with climbing related activities for over 30 years. I have climbed both traditional and sport (bolted) climbs/routes and currently still do on National Forest Lands, primarily non-wilderness.

For almost as long, after mentoring by some great friends, I have been involved with putting up new routes and replacing old fixed gear, primarily by installing bolts and associated fixed gear. I have seen both good and bad with respect to bolting but by far, the good far outweighs the bad; there are always unique, minimal bad results and bad actors. The community usually deals with them as needed via The Access Fund's involvement and/or the various community "climbing coalitions" for example.

Importantly, over this time period I have seen changes (for the better) with respect to bolt and bolting hardware and fervently believe that this will continue as more is learned about the various and very specific geologic/geographic, atmospheric (weather), and user impact characteristics on such hardware. Whether new materials, Stainless Steel, glue-ins, titanium, and who knows what might be developed? Different situations and the installer determine the type, quantity and place whether for safety, convenience, aesthetics, etc.

The rock types that I have been involved with and their locations vary from very solid Granitic type rock (North Phoenix areas), Volcanic Tuff (Oak Flat areas east of the Phoenix Metropolitan area and The Enchanted Tower near Datil, New Mexico), Limestone (Jacks Canyon and The Homestead in northern and central Arizona respectively), Schist and Pegmatite in Colorado near Loveland in the Big Thompson Canyon areas, and Quartzite near Prescott, Arizona (The Promised Land).

Importantly, each of these rock types has a different characteristic in terms of composition, density, hardness, etc. Additionally, each of the specific locations, sometimes just a few inches away can have a very, very different integrity. One spot can be solid and desirable for a piece of hardware while just a few inches away the rock can be cracked, loose, etc.

Thus, determining what and where hardware can or should be placed is a very, very specific and sometimes difficult task that must be figured out by the person placing such hardware.

As such, any limitations on where, why, and what the hardware's use is to be should be left to the person installing it.

So, specifically, in proposed Document "Forest Service Manual 2300," 2355.3:

Paragraph 2 that begins with "Coordinate with . . ." in my opinion, should have the caveat of "If or as needed." This helps clarify that there should be a determination as an active cooperation "with climbing organizations." ("As needed" is used as the start of the next paragraph as an example of where such language is common in 2300 for instance).

Very importantly with respect to safety and the way things have been practiced on USFS non-wilderness lands for eons, Section 2355.31 should NOT detail in the 1st paragraph anything after "plan,": ie.,", and when they are placed . . . Emergency placement . . ."

As I detailed above, when, why, etc., a placement (bolt) is installed has sooooo many variables that limiting such in any way may adversely affect the safety, convenience, etc., for the USFS non-wilderness enthusiast/visitor.

The more difficult it is made for an installer to make decisions, the more mistakes could be made.

It should be noted in the 2nd paragraph, that the "District Ranger" should work with climbing groups and individuals in an area before a climbing plan is even considered to be enacted. More than likely, this will result in a much better overall result than a top down dictate.

In the 3rd paragraph that starts with "The placement and replacement" is rather questionable. Again, I'm really not convinced that the USFS should be in the position of determining what/why hardware is placed. Typically, the climbing community at large, and small, determines this. Also, "reduces adverse resource impacts" though generally understood is really a very slippery slope in my view.

Maybe the most important (and really a bad idea in my opinion) is the 4th paragraph the starts with "Allow placement and replacement of fixed anchors only . . . "

In my experience of installing and replacing hardware in hundreds of situations, this "only" type of language is not in any way consistent with the overall good history of climbing on USFS non-wilderness lands. Such terms as "redundant" and "unnecessary" with respect to hardware is counter to placement determination (rock breaks/freeze/thaw, etc.), hardware improvement (whether mechanical devices like wedge anchors, glued in hardware, or even the discovery of better hardware compositions for the specific rock type and chemical interaction with hardware).

In my opinion the USFS would be better served to eliminate this paragraph altogether.

After all, paragraph 5 that starts with "Forest Service personnel . . . " aren't responsible for placements of hardware so paragraph 4 is very inconsistent and in my view, quite dangerous by getting involved with "only" situations. As I said above, each bolt placement is very, very specific and sometimes a situation requires "redundant" hardware that might, to the untrained or uninvolved, appear to be "unnecessary."

In my view, paragraph 6 that starts with "Motorized rock drills . . . " should be eliminated entirely. It is unnecessary. Besides, there really isn't a "rock drill," they are typically referred to in the industry as Hammer Drills, Impact Hammers, etc. Regardless, how things are installed with respect to tools falls outside the USFS determination on non-wilderness lands???

Again, if the intent for the USFS is to work with local climbing organizations and individuals, my view is to leave it as it has been. By refraining to detail what/why/etc., in terms of placement, hardware, tools, etc., and working with the public in managing the recreational activity of climbing on the multi-use public USFS lands the outcome will probably be much better. I would guess that a Climbing Management Plan (CMP) for the vast number of areas that exist will be unnecessary and should only occur with active public organization and individual involvement. I'd prefer to see the document rely and specify a CMP "only if needed in consultation with climbing organizations and individuals through public meetings, conferences, etc." If the USFS determines there might be a need then there should be a very public process.

Again, I've placed, replaced, and re-replaced a few bolts over time on USFS public non-wilderness lands for a long list of reasons. And while there are places where user impact is evident, overall, the climbing community is very good at picking up after itself, and responsive to USFS personnel concerns, comments, and suggestions. That isn't to say that there aren't bad actors in the climbing community, there are as there are with any human group.

Thank you for attending to some of my concerns. I do hope there is a healthy reworking of any document that looks to address climbing on public USFS non-wilderness lands, to wit, any "CMP" specifications.