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Organization: Arkansas Climbers Coalition

Title: Board Member

Comments: Arkansas Climbers Coalition

Re: Comments on Proposed Forest Service Manual (FSM) 2355 - Climbing Opportunities (Directives-4622)

Dear Mr. Nadas,

The Arkansas Climbers Coalition (ARCC) submits these comments on proposed FSM Chapter 2355 - Climbing Opportunities (91 FR 36796, June 18, 2026). ARCC represents climbers from Arkansas and beyond who recreate in the Natural State, including on the Ozark-St. Francis and Ouachita National Forests, the two National Forests in Arkansas and the backbone of climbing access in our state. Our forests span both wilderness and non-wilderness lands and our members have a direct stake in how this directive is finalized and implemented across both forests.

The ARCC works collaboratively with multiple ranger districts across both forests - on fixed anchor replacement, maintenance & area stewardship, a Wag Bag program to mitigate human waste at popular climbing areas in the Big Piney District, general climbing and recreation concerns, and communicating Forest Service messaging directly to the climbing community. We see this directive as an opportunity to build on our existing relationship. ARCC strongly supports the direction of this proposal and the overall effort behind it. Recognizing climbing - including fixed anchors - as an appropriate wilderness and non-wilderness use supports the climbing community, outdoor recreation, and allows for continued, reasonable development of climbing resources. Our goal in submitting these comments is to help ensure climbing management works well in practice: that climbing can continue to grow, that new routes can continue to be found and developed, and that climbers' needs are balanced against those of land managers and other forest users. We hope the final directive helps position climbers as an asset to National Forest management. With that goal in mind, we ask the Forest Service to consider the following clarifications before finalizing the directive.

Allow for the replacement of existing fixed anchors without prior approval when deemed a safety issue

In certain situations, the need for climbers to seek approval for one-for-one replacement of existing fixed anchors creates a delayed response, which could impact climber safety. In certain situations, the delayed timeframe for replacement approval can lead to continued and prolonged use of outdated fixed anchors. Allowing climbers to replace aging hardware on existing routes follows in the spirit of the EXPLORE Act and helps mitigate potential safety issues with a quick response.

Clarify the fixed anchor / fixed equipment line, and avoid a de facto prohibition on fixed equipment in wilderness. FSM 2355.05 defines a fixed anchor as "bolts and pitons... and similar hardware limited in size, scope, and function," while fixed equipment is defined residually ("a fixed line or ladder") and requires an MRA in wilderness (FSM 2355.32), with no presumption of approval or timeline. It is unclear whether mussy hooks, rappel chains, quicklinks, rappel rings, fixed draws and other small pieces of equipment in the climber safety system qualify as "similar hardware" or fall into the fixed-equipment category by default. This matters for safety: many routes, especially steep or overhanging terrain, require fixed lowering/rappel hardware to descend safely, and treating it as an "installation" requiring case-by-case MRA review functions as a practical ban, pushing climbers toward unmaintained, less-safe alternatives. We ask that anchor-point hardware used for lowering or rappelling, and fixed draws left on existing bolts, be treated as fixed anchors rather than fixed equipment, in both wilderness and non-wilderness settings. For any hardware that does remain classified as fixed equipment, we ask that limited, safety-necessary items be authorized through the same CMP-consistent pathway as fixed anchors, reserving full MRA review for larger-scale installations.

State a default-permissive rule for fixed anchor use and placement where no CMP exists

FSM 2355.31 ties non-wilderness anchor use to "the applicable climbing management plan," but CMPs are discretionary, resource-constrained, and may never be developed for many lower-traffic areas - including many on Arkansas's National Forests. We ask the Forest Service to state explicitly that, absent an approved CMP or specific closure order, both the continued use of existing fixed anchors, the replacement of existing fixed anchors and the placement of new fixed anchors may proceed under the general standards in FSM 2355.31-.32, rather than treating an approved CMP as a prerequisite for either.

Recognize that fixed anchors outside wilderness are primarily safety infrastructure

Fixed anchors outside wilderness should be recognized as appropriate primarily because they serve climber safety, not only because their resource impact is minor. A bolted anchor exists to prevent a fall, or to allow a climber to safely rappel or retreat from a route when no other option is available - that safety function is the primary reason fixed anchors are a necessary part of the climbing safety system, and it should be reflected as the leading rationale in the non-wilderness provisions of FSM 2355.31, not treated as secondary to resource-protection considerations.

Clarify the "bolt-intensive" standard for wilderness face climbs

FSM 2355.03 states that "the establishment of bolt-intensive climbing opportunities may be incompatible with the preservation of wilderness character," without defining the term. We ask the Forest Service to clarify what this standard means and how it will be applied. Many quality face climbs in wilderness are protected primarily or entirely by bolts, consistent with the rock and terrain, and their presence does not, on its own, diminish wilderness character - these routes allow climbers to safely and responsibly access remote, primitive terrain that would otherwise go unclimbed. Left undefined, "bolt-intensive" risks inconsistent application from district to district and creates uncertainty for climbers and land managers alike. If the underlying concern is visual impact rather than climbing style, an objective standard such as hardware color-matching would be more targeted and easier to administer than a subjective density-based limit. We ask for similar clarity on "concentrated use," with a preference for collaborative management with local climbing organizations over removal of climbing opportunities as a first response.

ARCC appreciates the Forest Service's work toward a durable national approach to climbing management, and we support this directive's core framework. We offer these comments in the spirit of partnership, to help ensure the directive functions as intended at the district level and supports a future where climbing on Arkansas's National Forests can keep growing responsibly, alongside the interests of land managers and other user groups. We welcome the opportunity to discuss any of the above and to work collaboratively with the Forest Service going forward.

Respectfully Submitted,

Arkansas Climbers Coalition