

Data Submitted (UTC 11): 7/21/2026 3:09:24 AM

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Comments: This comment is submitted in response to the USFS proposed directives regarding rock climbing on USFS public land. I have been rock climbing on our nation's public lands for more than 30 years. Additionally, I make my living teaching rock climbing and outdoor leadership to a variety of audiences. Rock climbing has become increasingly popular and is accessible to people of all ages (I'm 62). I share the following thoughts/comments in regards to the USFS proposed directives.

Congress has acted to recognize rock climbing as a legitimate use (including the use of fixed anchors) on national public land, and therefore, intended it to be protected going forward. Any directives should come from a place of protecting access for rock climbing as an appropriate activity on public land (including wilderness). Any management tools that constrain access should be using the least onerous constriction.

Climbing Management Plans have been notoriously untimely for decades. Many failed attempts have occurred across the country in some of the most famous rock climbing destinations (eg. Red Rock Canyon National Conservation Area). "Temporary" moratoriums on new installation or replacement of existing anchors pending adoption of climbing management plans would be contrary Congress' directive to protect access to rock climbing. No prohibitions on installation of fixed anchors or new bolting should be integrated into the directives pending adoption of climbing management plans. Again, Congress has acted and said that fixed climbing anchors are legitimate (ie. they don't violate the Wilderness Act). Any limitations should be the result of fully adopted Climbing Management Plans, not temporary prohibitions pending adoption of such plans.

The directives fail to recognize that routine replacement of anchors occurs BEFORE anchors actually are in imminent danger of failure or that they have actually failed. The directives should recognize that routine replacement should be allowed without prior authorization or prescribed process involved. The directives should also not include standardized methods or hardware as they are not experts. Modern hardware is far better than the fixed anchors installed decades ago. Perhaps simply an encouragement that installers use appropriate methods and materials to ensure the replacements are long-lasting.

The prohibition on adhesives absent additional approval may discourage replacing deteriorated expansion bolts with longer-lasting glue-ins where appropriate. Language should be modified to recognize adhesive anchors (glue ins) as a standard type of fixed anchor--and in many areas actually considered the gold standard these days.

Section 2355.32 states "and allowing placement of fixed anchors and fixed equipment 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." This language is confusing and should be removed.

Non-Wilderness Specific

The primary concern remains the lack of a definition for replacement and the continued reliance on local planning documents for authorization. Power (motorized) drills should be broadly authorized for bolt placement/replacement and should not be dependent on the existence of a CMP for the district.

The language regarding not allowing redundant or otherwise unnecessary placement or replacement of fixed anchors and fixed equipment is confusing and impractical as climbers count on redundancy at anchor stations, rappel stations, etc. This should be clarified or removed.

I urge the USFS to restructure its directives so that the default for access to rock climbing, installation of fixed

anchors, and replacement is not constrained until and unless land managers (through full administrative processes) have determined that there are compelling reasons to do so. The bureaucratic hurdles referenced in the directives are completely arbitrary and capriciously undermine Congress' recent intention to protect access to rock climbing and recognize it as an historically important and appropriate use of our public lands, including wilderness.

Thank you,
Scott Robertson