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Comments:

Replacement shouldn't hinge on Climbing Management Plans.

The directive repeatedly links the placement, replacement, and retention of fixed anchors to Climbing Management Plans (CMPs), stating that climbers may only place or replace anchors where a land management plan or CMP permits it.

Routine replacement of worn-out hardware shouldn't depend on whether a forest has finished a CMP - doing so creates needless uncertainty and risks becoming a de facto ban, delaying maintenance in forests without climbing-specific plans. Since few CMPs currently exist and they can take years to complete, replacement authority should be granted broadly so dangerous hardware can be fixed promptly.

Preventive maintenance isn't clearly addressed.

The directive allows emergency replacement when there's an imminent safety threat, but most hardware is actually replaced well before it reaches that point. The directive should explicitly recognize proactive replacement of aging hardware as legitimate stewardship, not just emergency response.

Replacement" is left undefined

Several key terms go undefined, and some language is vague and overly open to interpretation. In practice, modern replacement often means swapping obsolete or degraded hardware for safer, more durable equipment; shifting anchors slightly into sounder rock; adding a bolted anchor to spare trees from rappel-sling damage; or upgrading outdated anchor systems. The language should be updated to reflect these current best practices.

Restrictions on adhesives.

Banning adhesives without extra approval could discourage climbers from replacing aging expansion bolts with more durable glue-in anchors where that's the better option. The directive should recognize glue-ins as a standard, accepted type of fixed anchor.

Confusing wording

Section 2355.32 references allowing fixed 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." This phrasing is unclear and should be cut. If it's meant to address blank wall sections on aid routes (i.e., permitting bolt ladders to bypass them), that intent should be spelled out directly.

Non-Wilderness

The core issues here are the same: no clear definition of "replacement," and continued dependence on local planning documents for authorization. Power drills should be broadly permitted for bolt placement and replacement, without requiring a district-level CMP first.

The provision barring "redundant or otherwise unnecessary" placement or replacement of anchors is unclear and impractical - climbers rely on redundancy at anchor and rappel stations for safety. This language should be clarified or removed entirely.