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Comments: I support the Forest Service's proposed national climbing guidance and appreciate its efforts to implement the EXPLORE Act. Establishing consistent national direction for climbing management is an important step forward, and I encourage the agency to strengthen the final guidance in several key areas.

First, the final directive should clearly distinguish routine replacement of existing fixed anchors from the installation of new fixed anchors. Replacing worn or unsafe bolts with modern hardware is maintenance of existing infrastructure, not new development. One-for-one replacement of existing anchors should be allowed without requiring a Climbing Management Plan, site-specific analysis, or additional authorization. Delaying replacement of aging hardware until local planning documents are completed creates unnecessary safety risks and discourages the volunteer stewardship that has long benefited our public lands.

The directive should also explicitly recognize that replacing aging hardware sometimes requires minor adjustments to improve safety and durability. Small relocations into sound rock, replacing obsolete anchor configurations with modern systems, or using current best practices should all be considered part of responsible maintenance rather than new route development. These changes preserve the character and intent of established climbs while ensuring that anchors remain reliable for future users.

In addition, the final guidance should provide a practical pathway for addressing unsafe anchors that present an immediate hazard. Climbers should not be forced to leave dangerous hardware in place while awaiting lengthy administrative processes when timely replacement can significantly reduce the risk of serious accidents.

I also encourage the Forest Service to ensure that any future review process for new fixed anchors is clear, efficient, and based on local resource concerns rather than creating unnecessary procedural barriers. Local land managers should retain flexibility to protect sensitive resources where appropriate, but the national policy should provide enough consistency that climbers, volunteers, and agency staff share a common understanding of how fixed anchor management is intended to work.

The climbing community has a long history of partnering with land managers to responsibly maintain fixed anchors, educate users, and protect natural resources. A final directive that recognizes routine anchor replacement as essential maintenance while providing clear national guidance will improve public safety, reduce confusion, and support the continued stewardship of our public lands.

Thank you for considering these comments and for developing a national policy that supports both conservation and responsible recreational climbing.