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First name: Daniel

Last name: Peter

Organization:

Title:

Comments: Thank you for the opportunity to comment on the proposed revisions to FSM 2355 regarding climbing management on National Forest System lands. I appreciate the Forest Service's efforts to provide a consistent framework for managing climbing while protecting public lands. I respectfully offer the following recommendations.

1. Replacement and Modernization of Existing Fixed Hardware

Routine replacement of deteriorated climbing hardware should not depend on whether an individual forest has completed a Climbing Management Plan (CMP). Requiring an approved CMP before replacing aging or unsafe hardware creates unnecessary uncertainty and could result in a de facto prohibition on essential maintenance in many areas.

Only a small number of forests currently have CMPs, and developing them can take many years. During that time, deteriorating hardware may remain in place or routes may become unsafe because volunteers and local climbing organizations are unable to perform routine maintenance. The directive should explicitly authorize replacement of existing fixed hardware regardless of the status of a forest's CMP.

Replacement should also automatically allow updating hardware to current climbing safety standards rather than requiring exact one-for-one replacement with outdated technology. Examples include replacing older expansion bolts with modern glue-in bolts, which generally provide greater durability and reliability.

Similarly, preventive maintenance and minor modifications that improve safety should be explicitly permitted. Examples include:

- Relocating an anchor a short distance to more stable and sound rock.
- Installing modern anchor systems with appropriate redundancy.
- Adding protection to update routes to modern safety practices to reduce antiquated bolting distances. Especially where routes are rated e.g. R or PG13. An improved spacing based on contemporary climbing practices should always be allowed. The addition of protection does not alter the nature of a climbing route but enhance the safety of all climbers.
- Replacing obsolete hardware with modern designs that reduce long-term maintenance needs.

These types of improvements preserve the character of existing climbs while reducing unnecessary risk to visitors and decreasing future maintenance requirements.

In non-wilderness areas, the draft language prohibiting "redundant or otherwise unnecessary placement or replacement of fixed anchors and fixed equipment" is confusing and impractical. Redundancy is a fundamental principle of modern climbing safety. Climbers routinely rely on redundant anchor systems at belay stations and rappel anchors because they provide essential backup in the event of hardware failure. The directive should clarify that safety-related redundancy is appropriate and should not be considered unnecessary, or alternatively remove this language altogether.

2. Development of New and Existing Climbing Areas

The directive should recognize that climbing is not a single activity but a diverse collection of disciplines, each with different infrastructure needs and management considerations.

Public lands currently support a wide spectrum of climbing styles, including:

- Free solo climbing with no fixed hardware.
- Alpine climbing.
- Traditional ("trad") climbing.
- Modern sport climbing, including areas with higher bolt density.

These different styles appeal to different users and all have an appropriate place on public lands. Management should encourage this diversity rather than favoring one climbing style over another.

Accordingly, the directive should remove language establishing blanket limits on bolt density. Appropriate bolt density depends on local geology, terrain, historical development, route character, visitor demand, and management objectives. A single nationwide standard cannot appropriately accommodate the diversity of climbing opportunities found across National Forest lands.

Modern sport climbing with higher bolt density should not be viewed as fundamentally incompatible with public land management. Rather, it reflects advances in risk management similar to improvements seen in many other recreational activities.

An appropriate analogy is the evolution of automobile safety. Lower bolt density on older routes is comparable to driving a car built in the 1970s without modern safety features such as airbags, electronic stability control, or advanced seat belts. Modern sport climbing hardware represents the equivalent evolution in safety technology. Older routes could certainly be preserved where appropriate e.g. by adding bolts in a different color to differentiate to the previously existing bolts. In that way both goals can be achieved. Climbers can either climb with the original safety equipment or with the modern on. Management policy should also allow the development of routes that incorporate contemporary safety standards. However coming back to the car analogy the wearing the seat belt should be encouraged even while we are most of the time not getting into an accident.

Finally, the Forest Service should actively encourage development of climbing opportunities in appropriate front-country and non-wilderness locations, particularly moderate climbing areas and modern sport climbing destinations as these will get most users. This approach is analogous to concentrating recreational use through campgrounds, trail systems, picnic areas, and other developed recreation infrastructure.

Providing high-quality climbing opportunities closer to roads and developed recreation areas naturally concentrates use where impacts are easier to manage while reducing pressure to develop remote wilderness climbing areas. By accommodating a broad range of climbers in accessible locations, the Forest Service can both improve recreational opportunities and better protect wilderness character.

Conclusion

The final directive should clearly authorize routine replacement and modernization of existing hardware without requiring completion of a Climbing Management Plan, explicitly permit safety improvements modern climbing standard, clarify that redundant anchors used for safety are appropriate, avoid arbitrary nationwide limits on bolt density, and encourage a diversity of climbing opportunities across both wilderness and non-wilderness landscapes.

A flexible, safety-focused approach will better serve the climbing community while supporting the Forest Service's goals of public safety, resource protection, and sustainable recreation.