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First name: Eric

Last name: White

Organization:

Title:

Comments: Wilderness

1. Replacement is heavily dependent on Climbing Management Plans.

The directive repeatedly ties the placement, replacement, and retention of fixed anchors to Climbing Management Plans and states that climbers may place or replace fixed anchors when allowed by a land management plan or CMP.

Routine replacement of deteriorated hardware should not depend on whether a forest has completed a CMP. This creates unnecessary uncertainty and potential for a de-facto ban. This could delay maintenance in forests that lack climbing-specific plans. Very few CMP's currently exist and can take a very long time to create, replacement should be broadly authorized to allow timely replacement of dangerous hardware.

2. Preventive maintenance is not clearly recognized

Emergency replacement is allowed when there is an imminent threat to human safety. However, most replacement occurs long before hardware becomes an emergency.

The directive should explicitly recognize proactive replacement of aging hardware as an appropriate stewardship activity.

3. Replacement is undefined

Other provisions leave important terms undefined, and contain language that is hard to understand and highly interpretive. Modern hardware replacement often involves replacing obsolete or deteriorated equipment with safer, longer-lasting hardware, modestly relocating anchors into sound rock, adding a bolted anchor to prevent damage to trees by rappel slings, or upgrading outdated anchor systems.

Language should be modified to allow for current best practices in anchor replacement.

5. Glue restrictions

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.

6. Confusing Language

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. If it is referring to blank sections of wall on aid routes to allow for bolt ladders to bypass these sections, that should be clarified.

Non-Wilderness

1. 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.