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Comments: Thank you for the opportunity to provide feedback on the proposed climbing directive.

I appreciate the Forest Service's efforts to develop consistent guidance for climbing management while balancing recreation with resource protection. I strongly support protecting sensitive natural and cultural resources and recognize that site-specific management may be appropriate where legitimate resource concerns exist.

However, I am concerned that the proposed reliance on Climbing Management Plans (CMPs) is too broad and could unintentionally create unnecessary barriers to routine stewardship activities. CMPs should not become a prerequisite for routine maintenance activities such as replacing worn or aging fixed hardware.

Bolts and anchors are life-safety equipment. Like any critical infrastructure, they deteriorate over time due to corrosion, metal fatigue, freeze-thaw cycles, and repeated use. Waiting for a Climbing Management Plan to be developed, amended, or interpreted before allowing routine replacement of existing hardware is impractical and introduces unnecessary risk. The directive recognizes that climbers-not the Forest Service-are responsible for evaluating and maintaining the safety of fixed anchors. Requiring those same climbers to navigate an administrative process before replacing unsafe hardware creates a disconnect between responsibility and authority.

Routine replacement of existing bolts with equivalent hardware should not be treated the same as establishing new climbing routes or substantially altering the character of an area. Replacing an aging bolt in its existing location does not increase climbing impacts, expand access, or change management objectives-it simply preserves the existing level of safety on a route that already exists. The directive should clearly distinguish between maintenance of existing infrastructure and proposals for new route development.

A more practical approach would be to explicitly allow replacement of existing fixed anchors with substantially equivalent hardware by qualified climbers and recognized stewardship organizations without requiring prior approval through a Climbing Management Plan, except where specific resource protections or closures have been established. This approach would maintain public safety, encourage volunteer stewardship, reduce the administrative burden on Forest Service staff, and allow agency resources to remain focused on genuine resource management issues rather than routine maintenance.

I am also concerned by the statement that "the establishment of bolt-intensive climbing opportunities may be incompatible with the preservation of wilderness character." While I recognize that preserving wilderness character is an important management objective, this language is overly broad and risks discouraging an entire style of climbing without considering the context or purpose of bolt placement.

Bolt density alone is not an appropriate measure of environmental impact or wilderness character. A well-designed sport climb with closer bolt spacing may have little additional environmental impact compared to a route with fewer bolts, while substantially improving climber safety. Modern sport climbing has significantly expanded participation in climbing by making technical climbing accessible to a broader range of people. Appropriate bolt spacing reduces the likelihood of ground falls, ledge falls, and other preventable injuries while still preserving the physical and mental challenges inherent to climbing.

Rather than evaluating proposals based on the number of bolts alone, management decisions should focus on measurable resource impacts, including effects on vegetation, wildlife, cultural resources, visual character, and visitor use patterns. If a route can be established or maintained without causing unacceptable impacts to these resources, bolt density by itself should not be viewed as a basis for limiting climbing opportunities.

Lastly, I encourage the Forest Service to revise the proposed language restricting the use of motorized rock drills, certain maintenance practices, and the placement of fixed equipment in wilderness unless a Minimum Requirements Analysis (MRA) determines they are the minimum necessary for administration of the area under the Wilderness Act.

While I understand the importance of preserving wilderness character, this provision appears to establish a management framework that is impractical for routine climbing stewardship and maintenance. The requirement for an MRA is an appropriate tool for evaluating agency actions with significant management implications, but it

should not become a prerequisite for every activity necessary to maintain existing climbing infrastructure safely. In particular, prohibiting the use of motorized drills absent an MRA creates unnecessary obstacles to replacing aging bolts. Modern stainless-steel expansion bolts are intended to be installed in precisely drilled holes that meet manufacturer specifications, and glue-in fixed anchors are also modern climbing standards. The method of installation has little bearing on the long-term visual or environmental footprint of a replacement bolt, as the finished installation is effectively identical.

Finally, I support continued collaboration with local climbing organizations, which have decades of experience maintaining climbing resources, replacing aging hardware, and promoting responsible stewardship. Empowering these groups, rather than expanding administrative oversight, will better serve both climber safety and conservation goals.

Thank you for considering these comments and for working to preserve access to high-quality climbing opportunities on National Forest System lands.