

Data Submitted (UTC 11): 7/21/2026 3:58:07 AM

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Comments: As an avid traditional climber, I am writing in support of allowing fixed anchors on public lands by crafting sensible regulations which balance the preservation of wilderness with long-standing practices in rock climbing as a form of recreation.

The climbing community takes the topic of bolting seriously because a) fixed anchors are an essential element of safety in recreational rock climbing, and b) we recognize the negative impact irresponsible bolting can have on the character of wildlands and, by extension, the public's perception of climbing at large. Spirited discussions about the ethics, technical best practices, risk assessment, and environmental impact of fixed anchors are always occurring within the community, because it matters.

I do not believe that agency guidelines which are favorable to climbers will result in a massive increase in bolting activity in wilderness. Yes, the sport is growing, but its expansion into wilderness is tempered by a number of factors including plentiful established climbing areas, the sustainable nature of climbing routes (which are not a consumable resource requiring continual extraction anew from wildlands), and the barriers posed by wilderness itself. The more remote a wilderness, the less feasible intensive route development is. The time, effort, and resources needed to lug bolts, drills, glue, etc. far into the backcountry inherently limit the proliferation of excessive anchor placements. In addition, the ethics of climbers willing to make such a long trek often skew towards traditional, minimalist practice, a far cry from the attitudes of those who would create densely bolted sport climbing destinations.

I commend the directive's language in section 2355.1 regarding inherent risk. Climbing is dangerous - there is a reason why the great majority of climbing guidebooks and instructional manuals say so. It is well established that the use of anchors by climbers falls under the umbrella of personal responsibility. I firmly believe liability concerns regarding fixed anchors are overblown, and it is helpful that the directive explicitly addresses these concerns.

Section 2355.05 considers anchors exempt from treatment as "installations" under Section 4(c) of the Wilderness Act, provided that they are consistent with, among other things, wilderness stewardship principles. I believe that, due to their minimal size, visibility, area of ecological disturbance, and long maintenance interval, fixed anchors do adhere to these principles.

Section 2355.32 - Motorized drill use in wilderness should not be subject to MRA, since these drills are a standard and essential part of proper, safe anchor installation. Hand drilling can be fraught with error, leading to misshapen holes which compromise the integrity and safety of anchors installed in this manner.

Section 2355.32, regarding chipping and glue for hand- and footholds - Chipping has never been considered acceptable practice in climbing, and the community at large has always strongly condemned it. Regarding glue, its use for constructing holds is regarded similarly to chipping. This practice is distinct from the use of glue for bolt installation - indeed, glue-in bolts are a modern, emerging technology which has significant advantages in strength, corrosion resistance, and longevity over conventional sleeve and wedge bolts. I recommend the directive's language be amended to clarify these distinctions.

I agree that "Fixed Equipment", i.e. larger, more sophisticated equipment such as ladders and semi-permanent ropes, should be treated more strictly as "installations". These types of equipment are mostly associated with via ferrata route construction, a much more drastic form of rock modification which is largely a European phenomenon, only slowly making inroads and currently considered controversial in the United States. It is important to emphasize the significant differences between traditional rock climbing and via ferrata, especially

when educating the public about the relative impacts of the respective activities. I recommend the agency adopt language to clarify this.

The idea that permitting power drills for fixed anchor installation will result in "flooding the wilderness with noisy machinery" displays a misunderstanding of the nature of bolting at best, and is disingenuous and misleading at worst. Specifically, the disturbances incurred by route development are very brief, and generally only reoccur very infrequently. For a day or two of drilling activity, a climbing route can be established which will last for decades before maintenance / rebolting is needed. In assessing the overall impact of a route over time, the activity of climbing itself over the years far outweighs the impact of the initial establishment of the route. If this is to be taken into account, we might as well begin discussing the ban of climbing itself, which contravenes the EXPLORE Act's explicit recognition of climbing as an appropriate wilderness recreation activity. Note also that this impact of climbing would still occur if the route were established as a leave-no-trace trad route protected exclusively with removable protection, and no fixed anchors whatsoever.

I appreciate the opportunity to contribute to the discussion surrounding this important issue regarding a form of recreation I hold dear.

-- Andrew Piepenbrink