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Comments: Hi! Thank you so much for putting effort into thinking about how the wilderness should be managed. I want to kindly remind all of you that hand drilled fixed hardware to maintain safety in the back country is very humble compared to the giant scale of rock found in the wilderness and humble impactfully on the scale of geological time. Even mines, blasted, wood-filled-environmentally damaging mines in the wilderness are slowly dissipating in the power of the natural world and with the immensity of time. Banning one to four inch x 1/4" to 1/2" penetrating bolts in remote regions of the mountains will have only devastating human results, not rock quality results. Granite sheds layers faster than a Siberian in Tahiti.

You might say, well, the steel left behind is pollution. Luckily, steel, made of iron ore, turns right back into dust, as evidenced by the mining equipment left behind in various regions of wilderness across the US. I do agree that nylon webbing is a permanent pollutant, and we should gear towards not leaving behind webbing. I'm more in favor of steel options.

Also, I want to point out that you guys have much bigger fish to fry. For example: fishermen. They leave behind MOUNTAINS of non-biodegradable nylon line every year in the wild, only to clog streams and set bad examples. Next, you are so underfunded that you cannot successfully manage all of the illegal marijuana growing ops in various parts of the National Forest that are HAMMERING the local wildlife with toxins not even legally purchased in the US. How do you plan on enforcing climbing hardware, when you can't protect entire species of owls from grower's toxins?

I'm reminded here of Brexit. Brexit happened because people in the UK wanted change. Politicians were blaming immigrants for taking local jobs and the EU for taking away UK tax money. Instead of internally solving these problems, it was simply easier to pin the blame on the EU and ask voters to leave. Many people voted to leave not actually understanding that the EU wasn't the source of the UK's problems, it was actually a concern from within. But it sounded good, even though it benefited only a microscopic portion of the UK population. Here, we have a precious resource (the wilderness) with many user groups as stakeholders. The USFS has had voices of concern for its management for ages: snowmobiles or not, wheels or not, mules or not, backpackers verses climbers, etc. And here we can finally put one group on the chopping block, up for a vote. That will satiate the voices, the chatter. However, each group needs to ask themselves, rather than having a vote that could destroy the lives and livelihood of many many people, could I instead regulate myself? Maybe I should WAG bag instead of bury? Maybe I shouldn't put EVERY hidden gem on social media? Maybe I shouldn't put up this climbing route if it requires a lot of fixed hardware? Climbers have made the wilderness more accessible to geological discovery than any other user group and micromanaging their everyday fixtures is the Brexit of the Forest. Please reconsider... perhaps educate instead.

I also agree with my friends on the following recommendations:

Amid increasing usage of wilderness climbing routes, prohibiting service and installation of pitons, bolts, slings, and other fixed hardware would create a worsening public safety issue.

Rappelling is the primary cause of death in climbing accidents. When climbers rappel, they rely on a single anchor, and anchor failure during rappelling often results in death.

Prohibiting the maintenance of anchors or placing bolted anchors increases the risk of anchor failure.

Without the ability to leave behind equipment or modify existing slings or pitons, climbers will be encouraged to

trust the existing gear left exposed to weather over the years.

The proposed directives FSM 2355 will exacerbate an already significant threat to the climbing public who use USFS wilderness to climb.

Aging hardware makes climbing routes and descents less safe, which causes more accidents. This would increase demand on already overworked volunteer Search and Rescue (SAR) organizations.

The new directives will make existing routes more hazardous by discouraging maintenance of bolts and anchors.

Volunteer SAR organizations are overworked because of increasing usage of wilderness. Proposed directives FSM 2355 would create even more demand on SAR.

Rappelling off of bolts or fixed anchors is often the only option for climbers to self-rescue before activating SAR resources.

The proposed directives would prevent climbers from safely retreating from routes without SAR rescue, for example during inclement weather

The language in the new directives does not clarify whether volunteer SAR members would be permitted to place and determine the location of emergency rescue bolts.

Section 2355.03 paragraph 7 states that local government officials may determine if hardware is necessary for emergency purposes. However, volunteers typically make this determination with SAR groups. This language opens the possibility that SAR volunteers might be acting illegally while performing normal rescue operations. Volunteer SAR operates the majority of rescue operations in the Sierra Nevada mountain range.

Bolts and fixed rappel stations prevent resource degradation in fragile alpine environments.

Prohibiting fixed anchors encourages climbers to rappel off of trees and bushes, which can eventually kill cliffside vegetation.

Bolted anchors reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location.

Proposed directive FSM 2355 will encourage the creation of dangerous new routes.

Discouraging bolt placements will make certain belays more dangerous.

On wilderness routes, bolts are already placed sparingly. In situations where no removable gear can be placed, bolts are placed to prevent catastrophic falls. Prohibiting these bolt placements will lead to more catastrophic falls in the wilderness and more SAR rescues.

FSM 2355 has no plan to support increased staffing to document all existing hardware and enforce these regulations.

Many routes require rappelling in some form.

Rappels typically require leaving behind some form of equipment

In the Wind River Range (Shoshone National Forest) climbers are encouraged to only leave behind gear, rock

colored slings, and to clean-up any old slings left behind under boulders.

Even this hardly visible, self-regulated form of descent would be not permitted under the proposed directive.