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Comments: 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 gray, 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.