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Comments: 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