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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. This will result in increased anchor failures leading to more rappelling fatalities.

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. On certain routes where temporary protective gear cannot be placed, the inability to place or replace bolts will also increase the frequency of climbing accidents, leading to more fatalities, injuries and SAR team activations.

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. This will likely increase the risk to SAR team members during rescue missions.

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. Which means staffers and administrators will not have the time to properly review the need for new or replacement bolts or other fixed gear on climbing routes, so climbers will end up climbing with no bolts (or on unsafe older hardware) and existing bolts and anchors will not be maintained properly.

Many routes require rappelling in some form. Rappels typically require leaving behind some form of equipment. Under this proposed regulation, climbers who are rappelling from a route will still need to leave behind gear in violation of the regulation, or they will have to trust existing old gear that will become increasingly likely to fail over time.