Data Submitted (UTC 11): 1/10/2024 3:02:05 PM First name: Claire Last name: Stolz Organization: Title:

Comments: Hi, I am a hiker, climber, and participant in search and rescue operations. I have spent many happy days exploring the trails and backcountry of America's national parks and USFS wilderness. Most of my time in national forests has been in a hiking capacity, but I have done climbing trips as well. The recent proposal to ban fixed anchors and remove existing anchors is extremely concerning. These anchors have always been allowed in parks and forest service land, as part of a broader picture where climbing is allowed and encouraged in NPS and USFS wilderness areas. Climbing and exploration is at the heart of why we have these areas; in the National Forest Service's own words:

"But perhaps one of the greatest benefits is what wilderness areas can do for a person. For those who travel into wilderness areas the experience can be awe inspiring and life changing. Those treks are what made great novels and critically acclaimed essays. Many who venture onto wilderness areas come back out changed with a deeper understanding of why these lands are set aside. Each person has their own story."

Climbing is a huge part of my story, and of many people around me. Removing and banning anchors not only eliminates the "greatest benefits" of the wilderness, but it exposes any continued rock climbing to a massive increase in risk. People will be forced to use more dangerous anchors, which will result in accidents. Descending from climbs is one of the most dangerous part of climbing, and a large part of that is due to unsafe anchors.

Here are 10 examples from Accidents in North American mountaineering where the accident would have been avoided had a fixed bolt anchor been in place:

- 1. Anchor failure, cord damaged: http://publications.americanalpineclub.org/articles/13201215214
- 2. Anchor failure, pitons pulled out: http://publications.americanalpineclub.org/articles/13199905601
- 3. Anchor failure, sling broke: http://publications.americanalpineclub.org/articles/13201216612

4. Anchor failure, temporary anchor equipment pulled out:

http://publications.americanalpineclub.org/articles/13198504501

- 5. Anchor failure, sling broke: http://publications.americanalpineclub.org/articles/13201215567
- 6. Anchor failure, rock horn collapsed: http://publications.americanalpineclub.org/articles/13201214789
- 7. Anchor failure, temporary anchor equipment pulled out
- http://publications.americanalpineclub.org/articles/13201216255

8. Anchor failure, natural feature of rock broke http://publications.americanalpineclub.org/articles/13201215824

9. Anchor failure, UV damage on slings http://publications.americanalpineclub.org/articles/13201216677

10. Anchor failure, temporary anchor equipment pulled out

http://publications.americanalpineclub.org/articles/13201216668

Even more accidents can be found by visiting http://publications.americanalpineclub.org/ and searching anchor failure.

Accidents in the backcountry often require helicopter rescue, and are costly from a taxpayer perspective. An article on accidents in climbing stated that: "In almost half of the cases (48.6%) the terrain was exposed and in 40.5% of cases belaying the rescue team was necessary [my note: the rescue team will be greatly aided in speed and safety with fixed anchors]. In 94.6% of the accidents, the helicopter was involved in the rescue mission (air rescue only in 59.5% of cases, mixed air-terrestrial rescue in 35.1%). Only in 5.4% the rescue mission was performed terrestrially." https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6981967/

Helicopter rescue is extremely expensive and dangerous for the helicopter pilots. The additional search and rescue teams are also placed at increase risk. Having been a part of search and rescue operations myself, I find it devastating to think of the additional harm to recreationalists and rescuers alike if this policy goes into place.

I hope that you will reconsider this policy.