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Comments: I am writing to express my concerns regarding the proposed directives in FSM 2355 that would require permits for placing or replacing climbing bolts and hardware in wilderness areas. As an avid climber who regularly uses public lands, I worry these regulations, while well-intentioned, may have unintended consequences that negatively impact climber safety and increase strain on search and rescue resources.

Specifically, prohibiting maintenance of existing anchors or placement of new bolts increases the risk of rappelling accidents, which are the leading cause of death in climbing. Aging, weathered gear left in place for years creates a public safety issue. The inability to leave new gear or modify old slings and pitons encourages climbers to trust questionable anchors, exacerbating this problem.

Furthermore, the increased danger caused by old hardware may result in more climbing accidents, rescues, and a heavier burden on volunteer search and rescue groups that are already overworked due to growing recreational use of wilderness areas. The proposed policy undermines climbers' ability to safely retreat or self-rescue, necessitating full rescues in more cases.

The directive should clarify if SAR volunteers can place emergency bolts as needed, as they currently determine anchor needs during rescue operations. Restricting this rescue work could hinder these volunteer groups who provide essential, lifesaving services.

In addition, prohibiting fixed anchors may lead to more vegetation damage as climbers are forced to rappel off trees and cliffs rather than established rappel points. Thoughtfully placed bolts that direct traffic to one location can help protect fragile alpine vegetation.

Finally, restricting bolts will encourage creation of new, likely more dangerous routes as climbers seek available climbs. Sparingly placed bolts often serve fall protection purposes in unavoidable situations. Removing this safety net invites catastrophe.

In summary, while wilderness conservation is paramount, the climbing community believes the proposed restrictions in FSM 2355 prioritize preservation over public safety and rescue resource concerns. I urge reconsidering regulations that may inadvertently increase climber danger and strain on volunteer rescue personnel.