

Data Submitted (UTC 11): 1/30/2024 4:04:32 AM

First name: Lauren

Last name: O

Organization:

Title:

Comments: As a critical care doctor who fights to repair broken bodies, as a mountain rescue volunteer who strives for everyone to come home from the wilderness, and as an American who cares about keeping our wild places wild - I beg you NOT to add the directives in proposed FSM 2355 to FSM 2300.

We all agree that "climbing is a legitimate and appropriate use of wilderness" (Director's Order 41 §7.2). I trust that the NPS wants people who engage in legitimate wilderness activities to be able to do so safely. The proposed directives are incompatible with climber safety.

Our climbing community values the wilderness - we are happy to work with the USFS to ensure that fixed anchors are minimal. However, a proposed process that involves individual review of every single bolt by hardworking federal employees, who already have enormous jobs, is untenable. Such a delayed bureaucratic process would preclude our community from maintaining existing hardware or establishing safe new routes, which could result in injuries and deaths that are individual tragedies and unnecessary strains on medical and mountain rescue resources.

Here are some examples I can imagine could ensue:

- An established descent line is described in guidebooks and online resources, but climbers arrive at the expected descent and find it in unsafe disrepair because the permits couldn't be arranged to replace the hardware.
- A historic descent is recognized as dangerous due to rockfall, but it cannot be reestablished in a different place because a few anchor bolts were deemed unnecessary.
- A new easy traditional route is established. On the 2000-foot route, there is one place where a single bolt would protect the trickiest moves on the route. The bolt is not permitted, resulting in long falls with severe injuries. These accidents are resource-intensive and involve further risk to the search and rescue volunteers.
- In a descent down a treed gully, climbers are not allowed to use techniques which install minimal pieces of equipment and instead must pull a rope around a tree, unnecessarily killing several old trees in the gully.
- A good descent line cannot be established because it's deemed possible to descend without any fixed hardware. The search for the best bad option to descend results in much more impact on the fragile alpine environment than a safe, established descent with a few bolts in rock (a durable surface) would have.

I appreciate the value on leaving no trace in the wilderness - but this dangerous proposal is not the right solution. Thank you for listening to my community's concerns.

The views I express here are my own, not those of my employer or mountain rescue organization.