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First name: Jennifer

Last name: Flygare

Organization:

Title:

Comments: In reviewing the NPS and Appendix A proposal, the following points are evident:

- \*Bans any kind of anchor on multi pitch routes
- \*Conflates upward progression bolting and rap anchors
- \*Conflates bolts with other gear
- \*Considers ice screws to be fixed protection
- \*Ignores descent routes, where majority of accidents occur
- \*Compromises any emergency response team

These points alone are indicators that this proposal was written without appropriate experience in the very thing it seeks to regulate. I would recommend an exploratory committee be formed - something similar to the Park Service's local climber's coalition in Boulder, CO ([flatironsclimbing.org](http://flatironsclimbing.org)). Then at least the basics of climbing would be inherently understood and any legislation would contain comprehensive proposals.

I strongly support banning "upward progression bolting". I do not support sport climbers grid bolting anything and everything they care to climb. But this proposal doesn't seem to understand the difference between that and rappelling stations.

Please continue for a more thorough observational assessment of the proposal:

I wrote a wordy essay, and with respect for our Congresspeoples' time, I asked ChatGPT to make a list from my lengthy commentary.

#### 1.Public Safety Concerns:

oProhibiting the service and installation of essential climbing hardware, such as pitons, bolts, slings, and fixed anchors, could exacerbate public safety issues. Rappelling, a common climbing activity, becomes especially dangerous when relying on a single anchor. Anchor failure during rappelling is a primary cause of climbing accidents, often resulting in fatalities.

#### 2.Risk of Anchor Failure:

oProhibiting the maintenance of anchors or placing bolted anchors may increase the risk of anchor failure. This poses a significant threat to climbers who rely on these anchors for their safety.

#### 3.Impact on SAR Organizations:

oAging hardware on climbing routes contributes to accidents, leading to increased demand on already overworked volunteer Search and Rescue (SAR) organizations. The proposed directives may worsen this situation by discouraging maintenance of bolts and anchors.

#### 4.Hazardous Conditions:

oThe new directives could make existing climbing routes more hazardous by discouraging maintenance of bolts and anchors. This may result in increased accidents and further strain on SAR resources.

#### 5.Role of Volunteer SAR Members:

oThe 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. This ambiguity may lead to legal issues for SAR volunteers performing normal rescue operations.

#### 6.Environmental Impact:

oBolted anchors and fixed rappel stations play a crucial role in preventing resource degradation in delicate alpine environments. Prohibiting fixed anchors may encourage climbers to rappel off trees and bushes, causing damage to cliffside vegetation.

7.Social Trail Creation:

o Bolted anchors reduce trampling and social trail creation by directing climbers to specific locations. The proposed directive may result in the creation of dangerous new routes and increased environmental impact.

8.Safety of Climbers:

o Prohibiting bolt placements, especially in situations where removable gear cannot be placed, may lead to more catastrophic falls in the wilderness. This, in turn, could result in an increase in SAR rescues.

9.Experience and Responsibility of Climbers:

o Bolting of any kind requires experience, and new climbers aren't typically involved in such activities. Climbers, even new ones, are acutely aware of their responsibility to ensure the safety of themselves and others. The climbing community is deeply conscious of the potential consequences of their actions and is not inclined to compromise the safety of fellow climbers intentionally.

10.Classification of Fixed Gear:

o Intentionally classifying any fixed gear as an "installation" may misrepresent the climbing community as reckless. This classification appears to disregard the conscientious nature of climbers.

In conclusion, I urge you to consider the potential negative impacts on public safety, the environment, and SAR organizations before finalizing the climbing directives FSM 2355. It is crucial to strike a balance between regulating climbing activities and ensuring the well-being of climbers and the preservation of wilderness areas.

Thank you,  
Jen