Data Submitted (UTC 11): 1/19/2024 3:01:28 PM

First name: Cainan Last name: Little Organization:

Title:

Comments: These policies give a LOT of power to local, low-level officials who may not have the time or expertise to perform the MRAs and thus will just fall back on guidance that fixed anchors are "installations" and should be avoided whenever possible. I don't have a lot of faith that the local officials administering each park unit or USFS area will be able to adequately or timely assess the MRAs and applications, which may indeed stifle safety improvements and route development, even if both are in good faith. One of the big problems with the climbing plans is the use of 'should' and 'may' along with 'when funding is available instead of 'must' and 'shall' and specify some amount of funding towards a fixed anchor management plan, as well as the use of 'timely approval' but no specific dates are given. It also puts the plan and management upon the park director and does not list a recourse or appeal process. This will create a patchwork of wildly varying rules for what are essentially the same conditions around the country. The management plans as proposed also do a bit of waffling between the responsibility (or lack thereof) of the parks and the climbing community. They take no responsibility for what is up there yet they are able to dictate what and where fixed gear is placed by climbers.