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Comments: The proposed directives raise several concerns:

The proposed MRA review process will introduce a burden of paperwork requiring the involvement of USFS personnel. However, the proposed procedures are not accompanied by any increase in funding to the USFS to direct resources and hire employees to perform this work. Current USFS resources are stretched thin, and a realistic evaluation of an additional permitting procedure for fixed anchor placement and replacement would anticipate considerable delay, perhaps for years, between when a MRA is submitted and when the hardware requested is approved for installation. During this delay, climbers would continue to use unsafe fixed hardware awaiting replacement; which may eventually fail, perhaps with catastrophic and fatal consequences requiring community resources for rescue and body recovery. As the proposed procedures are not accompanied by any designated funding to ensure that the MRA approval process is timely and without delay, the procedures of draft manual 41 and regulation of fixed anchors will have unintended consequences and should be reevaluated.

Thousands of fixed anchors currently exist in wilderness areas of national parks and are relied upon by climbers for protection during ascent and descent where removable protection is not feasible. The proposed procedures would place a potentially prohibitive burden of paperwork for community rock climbers that replace these anchors and delay replacement of failing hardware. This would lead to preventable accidents, and in many cases any failure of hardware would be life threatening.

If fixed hardware were not allowed, or if approval of the installation of fixed hardware were delayed by the MRA process, climbers will need to leave removable protection for emergency descents. Slings and cordellette material, used as the most common retreat anchors where fixed anchors are not available, will degrade over time and contribute pollutants to the environment. In these cases climbers justifiably make the argument that fixed anchors are environmentally preferable to removable protection.