

Data Submitted (UTC 11): 1/30/2024 9:04:03 PM

First name: Emily

Last name: Wilkinson

Organization:

Title:

Comments: Dear USFS,

I oppose the proposed policy for the reasons listed below:

I believe there is a difference between reasonable high-level guidance and the actual implementation of a potential new policy. I am concerned that if this policy is passed, there will be a significant amount of power given to local, low-level officials who will likely not have the time or expertise required to perform the MRAs and thus will fall back on the easier-to-regulate guidance that fixed anchors are "installations" and should be avoided whenever possible, without regard to how this will impact the climbers' safety.

The reasons I envision it possibly impacting safety is if fixed anchors are classified as "installations," the possible legal consequence of needing to leave gear to descend from a route in unsafe conditions may deter climbers from utilizing all resources currently available to them. Furthermore, a legal consequence to replacing existing fixed anchors will result in routes being increasingly unsafe as the amount of wear on anchors of popular routes is only going to worsen as the popularity of climbing increases.

It is also currently not feasible to enforce regulations in place. Adding to these regulations would only spread underfunded resources thinner and decrease the ability to enforce them. 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.

I hope you take my concerns into consideration.

Sincerely,

Emily Wilkinson