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Comments: Greetings from a concerned rock climber and wilderness explorer,

The preservation of wild spaces in America for recreational use in a way that supports human and animal flourishing is one of the central practices which makes me proud to be an American. I am concerned, therefore, at the restrictive nature of the Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas.

My concern, which is shared by many in the climbing communities around our nation, is that this procedure in its current form will in fact restrict rock climbers' safe movement through the vertical landscapes of America's wild spaces. For decades, fixed anchors have played a pivotal, approved and self-monitored role in the rock climber's safety system. Fixed anchors are not prohibited "installations" under the Wilderness Act. Changing the interpretation of the Wilderness Act and breaking with decades of policy and practice is unreasonable. Furthermore, prohibiting fixed anchors and/or prohibiting the maintenance and replacement of existing fixed anchors will create safety issues by imposing unnecessary obstacles to the safe navigation of climbing terrain in the National Parks and/or National Forests and Wilderness Areas. Critical safety decisions are routinely made in the moment while rock climbing and any authorization process should not impede those safety decisions. Fixed anchor maintenance must be managed in a way that incentivizes safe anchor replacement and does not risk safety or the removal of climbing routes.

Additionally, restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

With deep consideration for the American climbing heritage rooted so deeply in the National Parks and/or National Forests and Wilderness Areas, I recommend revisiting this policy in order to provide the climbing community with the ability to continue to explore and promote human and animal flourishing in America's wild spaces through the established methods of placing and maintaining critical fixed anchors on existing and newly discovered climbing routes.

Sincerely,

Matthew Allard