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Comments: Fixed anchors are an essential piece of climbers' safety system and it is inappropriate to define them as "prohibited installations".

Proposed new federal regulation is inconsistent with existing climbing practices and will disrupt climbing regulation, and land management, more than it will aid.

Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement.

Prohibiting fixed anchors may force the removal of existing, safe, and well known climbing routes, which will reduce the safety and regulation of established routes. Furthermore, it will erode the history and culture of the climbing community, a culture of teaching safe practices, individual accountability, and responsible exploration.

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.

Climbing management policy needs to protect existing routes from removal.