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First name: Shara

Last name: Zaia

Organization:

Title:

Comments: I wholeheartedly agree with the AAC public comment: The American Alpine Club values this opportunity to represent the collective climbing community, work with other climbing and recreation organizations, and offer practical insight on the issue of fixed anchors to the agencies. In summary, the AAC would like the USFS to adopt guidance which affirms that fixed anchors are not installations prohibited by the Wilderness Act and allow agency land managers to administer their areas in a similar manner with what had been established under NPS Director's Order #41. In lieu of publishing such guidance, the AAC would ask that the USFS convenes a committee pursuant to the negotiated rulemaking process, or similar collaborative process, in order to address the issue of fixed anchors in Wilderness and implement guidelines following a committee report. The AAC reiterates that the MRA process is not only a technically incorrect tool for the evaluation of fixed anchors, but cannot be practically implemented due to agency underfunding and limited staffing, and such a process will inevitably lead to management by moratorium.

The AAC will remain committed to instilling the ethos of maintaining wilderness character, utilizing the best low-impact climbing techniques and practices, and staunchly supporting appropriate recreation in Wilderness. The AAC is ready and willing to assist the USFS to deliver on their dual mandate of conserving Wilderness characteristics while also ensuring the benefit and enjoyment of the Wilderness for the broader publi