

Data Submitted (UTC 11): 1/31/2024 4:11:39 AM

First name: Taylor

Last name: Luneau

Organization:

Title:

Comments: As a member of the American Alpine Club (AAC) and the Access Fund (AF), the countries two largest organizations representing the needs and interests of the climbing community, I encourage you to strongly examine their comments and engage them as thought partners as the agency considers their national climbing guidance. AAC and AF work with hundreds of local climbing organizations, volunteer chapters and individuals across the country and are deeply committed to stewarding our nation's climbing landscapes. Their comments will reflect the broader American climbing community however I offer the following points for consideration:

- 1) Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.
- 2) It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.
- 3) 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 and does not risk the removal of climbing routes.
- 4) Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.
- 5) Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.
- 6) I encourage the agency to consider an alternate planning strategy akin to appointing a federal advisory committee or to a negotiated rule making process to address the purpose and need of these climbing regulations. Doing so will create more durable management strategies for protecting America's Wilderness areas.
- 7) 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.

Thank you,
Taylor Luneau