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To Whom It May Concern:

Thank you for providing an opportunity for our community to voice opinions on the issue of climbing in wilderness areas. We appreciate the efforts of the National Park Service and the U.S. Forest Service in managing climbing across diverse land managers, but we feel compelled to express our reservations about the selected policy.

As an industry leader, our primary concern is the safety of our customers, employees, and athletes who rely on our gear for their adventures. The policy prohibiting fixed anchors raises safety issues by creating unnecessary obstacles to the regular maintenance of these anchors, a responsibility shouldered by the community we support. Critical safety decisions often require immediate action, and any authorization process should not impede those decisions. We believe that fixed anchor maintenance should be managed to incentivize replacements without jeopardizing climbing routes. Our commitment to the climbing community prompts us to voice concerns about their safety and continued access to the sport we all love.

Moreover, the proposed policy poses financial concerns for the larger industry. Across the United States, climbing is a \$12.5 billion dollar industry. This not only supports sustainable business for companies like ours, but also promotes the development and economic boost to numerous rural towns on the outskirts of climbing meccas across the country. According to a popular climbing platform called Mountain Project, there are over 65,000 established routes in NPS and USFS wilderness areas. The vast majority of those will include fixed anchors to ascend or descend technical terrain. A policy structured like the one you have proposed poses a threat to access to these types of climbing and has potential to effect the bottom line for companies like Black Diamond and the numerous rural areas who have built an economy around climbing.

Our company's roots lie in Yosemite climbing, and from our humble beginnings, Black Diamond has championed a "clean climbing" ethos. While we acknowledge the importance of preserving wilderness areas, climbing has long fallen within the parameters set to maintain the pristine quality of these areas. The proposed guidance threatens world-class climbing routes and endangers an entire legacy of climbing history, including our brand's history. Additionally, it introduces unnecessary red tape, hindering appropriate wilderness exploration for both land managers and climbers.

Black Diamond opposes this proposal as it affects our bottom line as climbing equipment manufacturers and jeopardizes the safety and enjoyment of our community, employees, and athletes. We support the current regulations that protect wilderness areas from unnecessary bolting, as defined under the Wilderness Act, and advocate for following existing policies that allow the judicious use of fixed anchors (status quo). This approach preserves wilderness character while facilitating primitive and unconfined wilderness climbing.

Thank you for your consideration.

Sincerely,

Jess Powell

Advocacy and Sustainability Manager

Black Diamond Equipment