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First name: Akio

Last name: Joy

Organization: Beartooth Mountain Guides

Title: President

Comments: Hello,

My name is Akio Joy and I am a co-owner of Beartooth Mountain Guides, a year round mountain guiding outfit based in South central Montana that guides and instructs through Special Use Permits on public lands in Montana and Wyoming. I am also one of less than 200 American IFMGA/UIAGM Mountain Guides and have been climbing for 15 years and recreating outdoors for all of my life.

I speak on behalf of Beartooth Mountain Guides, my business partners, our staff, and many of our guests when I say that we believe in the intent of the proposed authorization procedures, but the process is unfit for the future of climbers and outdoor recreationalists.

Much of the language displays a lack of thorough understanding of our pursuit, leading us to believe that the proposed management system may lack the proper oversight given it's broad range of enforceable policy. Similarly, much of the language is directed towards designated Wilderness, which leaves a gray area for much of operational terrain such as Yellowstone National Park and various Wilderness Study Areas.

The Minimum Requirement Analysis is an attempt at better defining fixed anchors and the process in which they can be approved, but seems too vague a process for us to accept. It leaves questions, such as what is the difference between an emergency bolt replacement and the normal process? What is defined as a bolt intensive face route? How will management agencies find the time and resources to complete an MRA before an accident occurs?

We support an overarching guidance on fixed anchors in wilderness and recognition of the legitimacy of climbing, but we believe this plan needs significant updating before it can be effective and representative of wilderness climbing.

Thank you,
Akio Joy