

Data Submitted (UTC 11): 1/30/2024 11:42:49 PM

First name: Jeff

Last name: Ho

Organization: Spire Climbing + Fitness

Title: Owner

Comments: Hello, I own and operate a commercial indoor climbing facility in Montana that is essential to our community. I am writing to show my opposition of the National Park Service and the U.S. Forest Service's proposed policy to ban new and existing anchors in Wilderness and USFS lands. The proposed prohibition not only threatens the existence of established climbing routes, it also obstructs climbers ability to replace old, unsafe bolts, and would be devastating to my business and the entire climbing industry. Climbers use our facility to train for outdoor climbing and a new policy such as this would be detrimental to each and every one of our members and customers. Please take into account the following points regarding the proposed new policy by the National Park Service and the U.S. Forest Service

*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.

*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.

*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.

*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.

*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.

*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.

Recently the House of Representatives and the Senate have moved forward with legislation that would protect wilderness climbing and allow for judicious placement and replacement of fixed anchors. I am in support of these bipartisan acts and any way we can preserve the future and safety of the climbing community and industry. Please reconsider the proposed policy to save our climbing areas.

Thank you