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Comments: I want to express my concern with the proposed changes to policies concerning fixed anchors and fixed equipment in wilderness areas, which could limit safe, sustainable access to historic climbing areas across the US. Many of these areas are world-renowned, bringing visitors from across the globe. A literal interpretation of the proposed policy changes could ban permanent decent anchors, resulting in removal of safe descent options, the closure of many classic climbs, and/or re-introduction of sling anchors which are more obvious to onlookers, are prone to failure resulting in numerous rescues and accidents, and can damage or kill trees over years and years of constant rubbing from the slings. In the US, there is already extreme internal pressure within the climbing community for leave no trace practices. These proposed changes to the classification of fixed climbing anchors are shortsighted and may backfire with an increase in accidents/rescues, unsightly sling anchors, and the death of trees used as anchors. These consequences do not appear to be considered in the proposed changes.

I want to express my appreciation for the NPS's acknowledgment in the draft proposal that Director's Order 41 §7.2 affirms climbing as a legitimate and appropriate use of wilderness. Recognizing that "the occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act" is a crucial step in acknowledging the historical context and importance of climbing in these areas.

However, I wish to bring attention to the subsequent statement in the proposal, particularly the assertion that "the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation." While it is commendable that Director's Order 41 §7.2 emphasizes that fixed anchors or fixed equipment should be rare in wilderness and that "clean climbing" techniques should be the norm in wilderness," it is essential to recognize that certain rock formations, such as pocketed limestone and featured granite do not have incipient cracks which allow for protection via gear such as camming devices, nuts or other clean protection. These rock formations require the use of bolts for protection. From the language of the draft proposal, it is clear that MRA proposals to develop "sport climbs" would be rejected. This is a complete change in how the wilderness act has been interpreted and would severely limit the climbing potential for US rock climbers.

It is crucial to strike a balance that allows for the preservation of wilderness areas while acknowledging the unique characteristics of different climbing styles and ensuring continued access for all climbers. The current NPS draft proposal as written falls short and I encourage the NPS to reconsider the absolute restriction on sport climbing, taking into account the diversity of climbing practices and adopting a nuanced approach that aligns with the principles of wilderness preservation and responsible climbing. It is important to acknowledge instances where route developers have successfully implemented such principles. For instance, in places like Yosemite and Joshua Tree, developers have demonstrated a commitment to preserving the natural character of the rock and limiting the placement of bolts on face climbs. There is a notable absence of "grid bolted" sport climbs in these parks, showcasing a responsible and thoughtful approach to route development.

Yosemite's Snake Dike (5.7 R) serves as a prime example of this ethos in action. Despite ongoing debates about the safety of certain pitches due to runouts, the route has not been retro-bolted to address these concerns. This decision reflects a commitment to preserving the ethics of the first ascensionists and respecting the historical context of the climb. Highlighting such examples is crucial to illustrating that a balanced and responsible approach to route development is not only possible but has already been successfully implemented in some of the most iconic climbing areas.

As we consider climbing management directives, I encourage the NPS to recognize and promote these positive

examples, fostering a culture of responsible bolting that respects the unique characteristics of each climbing area.

Thank you for your time and consideration,

Brian O'Callahan