



June 9, 2021

Joshua Tree National Park Attn: Climbing Management Plan Scoping Comments  
74485 National Park Drive  
Twentynine Palms, CA 92277-3597

Submitted online at: <https://parkplanning.nps.gov/commentForm.cfm?documentID=112237> and via email at [jotr\\_planning@nps.gov](mailto:jotr_planning@nps.gov).

**RE: Friends of Joshua Tree and Access Fund Comments on JTNP Climbing Management Plan Scoping**

Joshua Tree National Park Climbing Management Staff,

Friends of Joshua Tree and Access Fund appreciate this opportunity to provide comments during the scoping period for the Climbing Management Plan (CMP) now underway in JTNP. JTNP is a world-class climbing area with a rich history, visitors from all over the world, and a complex array of needs and stakeholders. This CMP will be critical in managing the many challenges and opportunities the park faces, both in-place and evolving, as climbing becomes ever more popular across the country and within the park. We look forward to working with park planners on finding solutions to climbing management issues that steward the environment, enhance the visitor experience, preserve access, and protect Indigenous cultural and sacred sites.

**Friends of Joshua Tree**

Friends of Joshua Tree is a non-profit organization dedicated to preserving the historical tradition of climbing in Joshua Tree National Park. Friends of Joshua Tree advocates, communicates, and encourages ethical and environmentally sound climbing practices, and works to shape park policy on climbing and climbing-related issues. Toward that end, Friends of Joshua Tree acts as the liaison between the climbing community and the National Park Service.

**The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing - rock climbing, ice climbing, mountaineering, and bouldering - the Access Fund is a US climbing advocacy organization with

over 20,000 members and 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project-specific funding, and educational outreach. California is one of Access Fund's largest member states and many of our members climb regularly within JTNP. For more information about Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## Comments

### Fixed Anchors

Of all the many management challenges present in JTNP, fixed anchor policy is at the forefront. A fixed anchor is typically defined as any piece of climbing equipment left behind by the climber to facilitate the safe ascent or descent of a formation, and can include slings, removable climbing protection ("trad gear"), and pitons, but is most frequently a bolt. Fixed anchors are an irreplaceable part of the climbing toolkit without which a huge swathe of Joshua Tree's climbing opportunities would be impossible.

#### *Fixed Anchors in Wilderness*

Wilderness climbing is an essential part of the JTNP experience for many of the more than 200,000 visiting climbers each year. The availability of primitive and unconfined climbing recreation draws many users to the JTNP backcountry. Even in Wilderness, however, fixed anchors are necessary. NPS Director's Order 41 (DO 41) specifically defines climbing as a legitimate and appropriate use of Wilderness, and also asserts that the occasional placement of fixed anchors does not violate the Wilderness Act.<sup>1</sup>

It is important to note that DO 41 does not define fixed anchors as "installations", does not include the term "installation" anywhere in section 7.2, and does not regard fixed anchors as fundamentally illegal in Wilderness. A broad based coalition of climbing organizations (Access Fund, American Mountain Guides Association and American Alpine Club) and conservation organizations (The Wilderness Society and National Parks Conservation Association) support the conditional use of fixed anchors in Wilderness and were critical in hosting a NPS workshop on climbing in Wilderness in 2017 during which neither NPS representatives nor non-profit organizations supported the assertion that fixed anchors are illegal in Wilderness.<sup>2</sup> Speaking on removing fixed anchors after a Wilderness designation, Melyssa Watson, Vice President of Conservation at The Wilderness Society, stated that "We understand that this is a very real concern of our partners in the climbing community, and we are committed to working collaboratively to remedy misapplications of the Wilderness Act in agency regulations and

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<sup>1</sup> [https://www.nps.gov/policy/DOrders/DO\\_41.pdf](https://www.nps.gov/policy/DOrders/DO_41.pdf).

<sup>2</sup>

<https://www.accessfund.org/news-and-events/news/access-fund-partners-with-nps-on-climbing-management-training>.

policies.”<sup>3</sup> As such, there is ample NPS policy and precedent confirming the legality of both Wilderness climbing and conditional fixed anchor use.

### *Wilderness Fixed Anchor Frequency*

The challenge, of course, is in determining the appropriate degree of fixed anchor use, and also the optimal method for administering fixed anchor placement. DO 41 states that fixed anchors should be “rare” in Wilderness, the definition of which both agencies and advocacy groups have struggled over for years. A clearer standard, however, is that “bolt-intensive face climbs” are incompatible with Wilderness “due to the concentration of human activity which they support, and the types and levels of impacts associated with such routes.”<sup>4</sup> This can be commonly understood to mean modern “sport” climbs, where bolts are the primary form of protection for the climber and occur with a high frequency (approximately every body length). In contrast, a climb that uses only a few bolts, sparsely placed (something very common in the JTNP backcountry), or a mixture of fixed anchors and removable protection, would not be a “bolt-intensive” climb, and as such would be permissible in Wilderness under DO 41 barring unacceptable environmental or cultural impacts. As such, we support the prohibition of new sport climbs in the JTNP backcountry, while urging the park to continue to permit appropriate, “rare” bolt placement to facilitate outstanding opportunities for primitive and unconfined recreation.

### *Wilderness Fixed Anchor Permitting*

In regards to permitting, we support JTNP’s efforts to administer new fixed anchor placement in the Wilderness through an application to place new fixed anchors. For an area with such a high concentration of use and number of climbs, it is reasonable to require authorization for new routes in Wilderness (which could include a strategic combination of programmatic and case-by-case authorizations). The nature of this process, however, is critical. At the April 20th public meeting on the new CMP, park planners asserted that fixed anchors were considered “installations,” and as such are technically prohibited in Wilderness (refer to previous section). Planners further asserted that a Minimum Requirements Analysis (MRA) would be the appropriate tool to permit fixed anchors, both new and replacement, in Wilderness.

We strongly disagree with these assertions. As mentioned earlier, fixed anchors are singled out as being legally permissible within NPS and other federal Wilderness both in NPS policy and in federal law.<sup>5</sup> It is critical that the park adhere to DO 41 and the long-standing precedent of appropriate conditional fixed anchor use in Wilderness. Right now, park planners have set a questionable, baseline assumption that fixed anchors are prohibited in Wilderness. And they have also begun to couple this assumption with proposed management strategies, without first

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<sup>3</sup><https://www.accessfund.org/news-and-events/news/access-fund-and-the-wilderness-society-collaborate-on-fixed-anchors-in-wilderness>

<sup>4</sup> [https://www.nps.gov/policy/DOrders/DO\\_41.pdf](https://www.nps.gov/policy/DOrders/DO_41.pdf)

<sup>5</sup> <https://www.congress.gov/bill/116th-congress/senate-bill/47/text>.

exploring a spectrum of ideas and solutions - which is the purpose of the NEPA planning process.

Furthermore, the MRA is a poor fit for permitting fixed anchor placement for recreational climbers. In fact, DO 41 specifically refers to MRAs as the only appropriate tool for “the placement of fixed anchors or fixed equipment for the administrative purpose of facilitating future rescue operations,” not recreational climbing.<sup>6</sup> MRAs are discussed in DOI literature in the context of putting administrative installations into Wilderness that would otherwise be prohibited by the Wilderness Act. In other words, MRAs are almost exclusively used to evaluate the need for nonconforming installations created by managers for the purpose of administering a Wilderness area - not as something to be applied to general, public use.<sup>7, 8, 9, 10</sup> In addition, MRAs could be applied to recreational climbing without assuming that fixed anchors are illegal in Wilderness. Instead of MRAs, we urge JTNP to use appropriate tools to administer permitting for fixed anchors, including many the park is already familiar with: special use authorizations, zone management, and thorough applications processed in a timely manner.

All signatories on this letter support a fair and transparent planning process, and we are committed to working with the climbing community and Joshua Tree park planners to craft the best possible CMP - one that protects cultural resources, safeguards sensitive ecological zones, and allows Wilderness experiences that are consistent with NPS policy and the Wilderness Act.

#### *Frontcountry Fixed Anchors*

We support the current allowances in place for frontcountry fixed anchor use, where new fixed anchor placement outside of wilderness, without the use of a power drill, does not require a permit. We also support the zone management strategy the park currently utilizes to designate restricted and open areas for fixed anchors throughout the park. We support the current open and restricted zones.

#### *Bolt Replacement and Rebolting*

While placing a bolt may need oversight or authorization from park management, the life-critical task of replacing aging, worn, or improperly placed anchors should be open to climbers on an at-will basis. This task adds no new additional impact to climbing areas and is essential for climber safety. As such, we strongly support the current policy of not requiring a permit for bolt-for-bolt anchor replacement in JTNP (with non-motorized drill in Wilderness). Climbers must be able to make the decision to replace unsafe bolts as needed, both in the field for personal safety, and preemptively for zones where bolts are reaching the end of their lifespans.

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<sup>6</sup> [https://www.nps.gov/policy/DOrders/DO\\_41.pdf](https://www.nps.gov/policy/DOrders/DO_41.pdf)

<sup>7</sup> [https://www.nps.gov/policy/DOrders/DO\\_41.pdf](https://www.nps.gov/policy/DOrders/DO_41.pdf).

<sup>8</sup> [https://www.nps.gov/orgs/1981/upload/NWSC-White-Paper\\_Min-Reqs-Decision-Process\\_508.pdf](https://www.nps.gov/orgs/1981/upload/NWSC-White-Paper_Min-Reqs-Decision-Process_508.pdf).

<sup>9</sup> <https://www.nps.gov/orgs/1981/rm41.htm>.

<sup>10</sup> [https://www.fs.fed.us/rm/pubs/rmrs\\_gtr340.pdf](https://www.fs.fed.us/rm/pubs/rmrs_gtr340.pdf).

The optimal tool for safely replacing old bolts is a power drill. While this may not be generally feasible in Wilderness settings, power drills should continue to be allowed for use in replacing bolts in the frontcountry via permitting. However, we also propose that the park consider a pilot program for Wilderness bolt maintenance with the limited and targeted use of power drills. In such a program, the park would closely manage bolt replacement in Wilderness for critical fixed anchor sites such as rappel anchors. Testing, including wildlife monitoring, could be done to evaluate the auditory impact from the brief, but high intensity use of a power drill versus the low volume, but much more sustained impact from hand drill replacement. These issues could be considered via MRA - the appropriate tool for administrative exceptions to Wilderness prohibitions. The MRA has been successfully used at other national parks (e.g., Rocky Mountain National Park) to provide an administrative exception for targeted bolt replacement with power drills. The amount of hardware that needs to be replaced in the JTNP backcountry is substantial, and doing so purely with hand tools is a massive task. Should this pilot program find that the impacts from brief, scheduled use of power drills is acceptable, using these modern tools could drastically increase the rate of anchor replacement and be highly beneficial to the safety of both the climbing public and JTNP employees who rely on rappel anchors (i.e. JOSAR).

JTNP has a separate application for rebolting a route. While we support the intent behind this, the semantics of rebolting vs. bolt replacement may be confusing for some users, as the two terms are often used interchangeably. Specifically defining rebolting as the act of realigning, adjusting, or otherwise reconfiguring the bolts on an existing route such that the new bolt placements do not reuse the old bolt holes might clarify the need for a rebolting permit, given that there is no permit needed in the park for a bolt-for-bolt replacement.

### *Hardware Standards*

We support current JTNP guidelines on hardware. Modern standards for bolts specify a minimum of  $\frac{3}{8}$ " diameter and 2.5" in length, made of stainless steel (both hanger and bolt to avoid mixing metals), manufactured or sold by a brand commonly accepted for climbing use (i.e. Fixe, certain Powers bolts, Petzl, Metolius, etc.). Visual impacts from fixed anchors can be minimized by camouflaging the bolt and hanger to match the rock. Varying environments will have varying needs in terms of hardware. However, in the dry JTNP climate, and with high quality, very hard granite being the norm throughout the park, more specialized hardware (like titanium bolts, or glue-in bolts), should not be necessary. For more details on hardware standards accepted by the climbing community, consult the American Safe Climbing Association webpage: <https://safeclimbing.org/new-anchor-guidelines>. Best available bolting techniques and hardware should always be used.

### **Bouldering**

Bouldering has exploded in popularity alongside sport and traditional climbing in recent years. As an extremely accessible form of climbing, bouldering has brought many into the climbing community and has seen a renaissance of sorts in JTNP, with many new boulder problems

being established. While free of fixed anchors, bouldering presents its own impacts, typically in the form of flattened vegetation at the base of boulder problems due to crash pads and repeated falls.

Standards and guidelines for bouldering should be similar in spirit to those for other forms of climbing - in other words, broadly permissive, with restrictions where specific, sensitive resources or sites come into the equation. Where rare plant species may grow at the base of a boulder problem, or where Indigenous cultural sites may be present, bouldering (like all forms of climbing) should be managed appropriately to mitigate impacts, in a targeted and specific manner. Bouldering can and does occur in Wilderness areas as well, where it is an appropriate activity, albeit subject to a higher standard in terms of resource protection. A robust education campaign is critical to mitigating bouldering impacts.

### **Access Routes**

The largest impact stemming from climbing recreation is often not a result of the act of climbing itself, but rather from the approach to and descent from the crag. Because so many climbing areas are off designated trails, it is rare for official park trails to go to the cliff bases or boulders climbers seek to access. As such, numerous user-created social trails have sprung up around the park, leading to braided/redundant trail systems, erosion, trampling, and other resource impacts.

These trails are essential for climbing access. However, they are also suboptimal from an environmental point of view. We suggest that JTNP work with the climbing community to identify essential climbing access trails, stabilize them where necessary to avoid further impacts, bring such trails into the official trail inventory, and close any remaining redundant or inappropriate trails. This is a major project, but is a strong strategy for preserving recreational opportunities while preventing environmental degradation. Access Fund has collaborated with the park for over 25 years on mitigating social trails, and is ready, willing, and able to assist with optimizing the JTNP climbing trail system, and has extensive local knowledge of the critical access points and problem spots around the park.

### **Overcrowding**

With visitation nearly surpassing three million users in 2019, JTNP, like many public land destinations, is grappling with the issue of overcrowding. In response to this national trend, and spurred on by case studies born from the need to reduce capacity during the Covid-19 pandemic, we are seeing public lands across the nation institute a variety of new systems to keep visitation within acceptable limits, such as timed entry permit systems and required reservations. If JTNP considers creating such a system, we feel it is critical that they engage with the public early and often to help devise a system that is fair and sustainable, and which optimizes the social experience of the park.

We also understand that the park is concerned with solitude in Wilderness in particular. One possible mitigation strategy to disperse use between climbers and the general public is to create new resources (trails, parking areas, etc.) targeted towards non-climbing recreation. For example, within the Wilson corridor, a loop trail between the Twin Tanks and the Cholla Cactus Garden would create an excellent zone for experiencing solitude in Wilderness that would be separate from climbing use.

## **Natural Resource Protection**

Climbers are very much an environmentally-minded group. A widespread commitment to conservation, extremely high compliance rates for seasonal raptor closures, and many hours of volunteer time devoted to stewardship all attest to the desire climbers have to protect the places they love to climb in. As such, we strongly support appropriate measures to safeguard flora and fauna from recreational impacts. Doing so falls in a spectrum from general education about LNT practices to targeted closures of sensitive areas. We support site specific management based on quantifiable surveys and data, and are happy to work with the park on devising management strategies and communicating regulations to the climbing community.

[Access Fund's handbook on raptor management](#) was recently published. The handbook is the result of years of effort to compile every relevant article related to managing recreation, specifically climbing, in raptor habitat, and it includes a 20 page reference list in Appendix A (a living document that is linked to the handbook). The handbook was reviewed and edited by Hawkwatch, UFWS, and NC Wildlife Resources Commission. It represents the latest knowledge base and mitigation models for protecting raptors. We suggest that JTNP utilize the most current, science-based models for protecting nesting raptors.<sup>11</sup>

We are also ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the NPS may require to provide for sustainable climbing opportunities in the park. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team, which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.<sup>12,13</sup>

## **Human Waste**

Improper disposal of human waste is a growing issue across all recreation user groups. JTNP has numerous frontcountry vault toilets which greatly assist in managing human waste disposal while climbers visit the park. Human waste disposal is a significant issue in backcountry settings

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<sup>11</sup><https://d1w9vyym276tvm.cloudfront.net/assets/Access-Fund-Raptor-Handbook.pdf?mtime=20210603122128&focal=none>

<sup>12</sup> <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

<sup>13</sup> <https://www.accessfund.org/pages/conservation-team>

which are far from vault toilets. Access Fund generally recommends in high use areas and or areas with fragile habitats (i.e. the desert) that climbers use ReStop or Wag bags and pack out their waste.<sup>14</sup> We suggest JTNP consider how they want climbers to manage their waste in the backcountry and include such considerations in the CMP.

## **Indigenous Communities**

We strongly support efforts by both the park and climbers to partner with and support the many Indigenous communities that count JTNP among their traditional lands. We acknowledge the place currently known as Joshua Tree National Park as the ancestral lands of the Cahuilla, Serrano, Chemehuevi, and Mojave peoples. Protecting Indigenous cultural and sacred sites is a crucial aspect of the CMP. Where climbing poses a risk to such places, we support mitigation measures appropriate to the scenario, whether that means education for recreationists, rerouting an approach trail, closures, or other methods. We are eager to work with the park and the local climbing and tribal community to discover ways that climbers can be better allies to tribes, and welcome any opportunities to learn from the Indigenous community.

## **Education**

Education is a constant need in popular destinations like JTNP, both in terms of LNT principles to prevent resource impacts, and also in terms of climbing best practices to avoid social impacts as well as search and rescue incidents. JTNP already provides useful educational resources to climbers in the form of printed materials, climber coffees, permit application processes, and other sources, and we appreciate and support the park's efforts in creating these opportunities. We are more than willing to contribute time and energy to additional educational efforts the park may wish to explore. Between our local and national resources, we are well-equipped to partner with the park and find innovative solutions to ensure users are well-equipped with the knowledge and skills they need to recreate sustainably, safely, and with respect for cultural resources.

## **Justice, Equity, Diversity, and Inclusion (JEDI)**

We urge JTNP to work with the local community to advance inclusive and equitable access to the park and its recreational opportunities. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. Beyond this, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area located in a diverse community, as well as within a short drive of one of the largest and most diverse urban centers in the nation, JTNP should be accessible to people from a wide variety of backgrounds. Access Fund and FOJT all have staff and/or members dedicated to JEDI issues, and are more than willing to offer our time and resources to assist the park in applying JEDI principles to their work on the CMP. The climbing community has embraced JEDI, and individuals, organizations, and land managers across the country are committing themselves to a vision of a more diverse

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<sup>14</sup> <https://www.accessfund.org/learn/the-climbers-pact/poop>



and equitable future for the lands they love. We strongly believe that JEDI has a role to play in climbing management, and are eager to support the park in their own JEDI journey.

Sincerely,



Katie Goodwin, Access Fund - California Regional Director



Taimur Ahmad, Access Fund - JEDI and Policy Associate



John Lauretig, Friends of Joshua Tree - Executive Director

Cc:

Chris Winter, Access Fund - Executive Director

Erik Murdock, Access Fund - Policy Director

Taylor Luneau, American Alpine Club - Policy Director