

Congress of the United States
Washington, DC 20515

December 3, 2003

Fran Mainella
Director
National Park Service
Department of the Interior
1849 C Street, NW Suite 3112
Washington, DC 20013

Dear Director Mainella:

We understand that you are reviewing Directors Order Number 41 concerning wilderness preservation and management. We write in strong support of the consensus opinion held by climbing organizations and outdoor wilderness advocacy groups regarding wilderness fixed anchor management.

As you know, three years ago several individuals and organizations participated as members of the U.S. Forest Service's Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee on the future of fixed anchor placement and replacement in designated wilderness. We support the majority consensus reached by of the Advisory Committee, which is outlined in the balance of this letter.

We believe the following points should be included and reflected in any management policy or regulation controlling the use and placement of fixed anchors in wilderness:

- The federal government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be allowed. The continued use of fixed anchors, if properly managed, will not degrade wilderness resources and values.
- Some level of fixed anchor use may be allowed wherever climbing is allowed, and the appropriate level of use should be established on an area-by-area basis.
- New fixed anchor placements will not proliferate because they are so difficult to place by hand without the assistance of prohibited motorized power drills.
- The federal land management agencies should not prohibit new fixed anchor placements outright between the date Directors Order Number 41 is reauthorized and the date that any new fixed anchor authorization process is established because such authorization procedures could take years to establish, thus instituting a *de facto* prohibition on new fixed anchor placements.

- Any national policy controlling fixed anchors in National Park Service (NPS) wilderness should be guided by the successful experience of parks such as Rocky Mountain National Park that manage a large amount of climbing.
- If the NPS will require prior authorization for all new fixed anchor placements, the Service should implement programmatic authorization because route-by-route authorizations would create an overly burdensome administrative process.

We support a management approach that considers new fixed anchor placements as allowed unless prohibited. Any national fixed anchor policy should limit unreasonable interim moratoriums if the NPS intends to implement a rule-like prior authorization regime for new fixed anchor placements. Fixed anchor authorizations should be provided programmatically, unless a demonstrated resource-based need requires route-by-route authorizations by zone. Excessive management of fixed anchors would only limit the activities of a legitimate user group and cause an administrative burden for federal land management agencies. We are hopeful that this matter will be resolved by the end of the calendar year 2003.

We look forward to your expeditious response on the status of this process and timetable for finalizing a revision on Directors Order Number 41 regarding fixed anchor placements in designated wilderness. We appreciate your efforts in resolving this issue.

Sincerely,
















