



March 10, 2011

National Park Service  
Wilderness Stewardship  
DO-41 Review  
1201 Eye (I) Street, NW  
10th Floor, Room 40  
Washington, DC 20005

**Re: Access Fund Position re National Park Service Director's Order 41 Section 7.2 on Climbing**

National Park Service Wilderness Planners:

The Access Fund welcomes the opportunity to provide comments to Director's Order 41: Wilderness Stewardship, revision January 2011 (DO #41). Section 7.2 on Climbing in the draft DO #41 is a significant step towards bringing clarity for both climbers and land managers regarding how to manage fixed anchors in National Park Service (NPS) Wilderness. We appreciate the work of the NPS and this proposal to address this longstanding climbing management issue which has caused conflicts among climbers and land managers.

Our comments are limited primarily to the provisions in Section 7.2 related to Climbing, although we do provide a brief statement regarding Section 7.3 on Commercial Services. We support the proposals set forth for fixed anchors in Section 7.2 with a few significant changes outlined herein that will make the policy more likely to accomplish the NPS goal that DO #41 provide accountability, consistency, and continuity in the National Park Service wilderness stewardship program, and to guide Service-wide efforts in meeting the letter and spirit of the Wilderness Act.

**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 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 10,000 members and affiliates.

The Access Fund has a long history of working cooperatively with federal land managers on the appropriate management of fixed climbing anchors in designated wilderness. We have been working since 1989 with all of the federal wilderness management agencies to resolve the issue of how fixed anchors should be managed, and we have also negotiated directly with the environmental community to achieve broad support for a national policy which allows, but appropriately manages, the use of fixed anchors in wilderness. In 2000 the Access Fund participated as a member 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 and since then we have worked with several national parks around the country on climbing policies related to fixed anchor use.

We support the majority consensus reached by of the Advisory Committee, which is essentially reflected in Section 7.2 of the draft Director's Order #41. With respect to the management of fixed anchors in wilderness, we believe:

- Some level of fixed anchor use must be allowed wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis. Surveys of the climbing community show that the vast majority of climbers support this position.
- The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. The continued use of fixed anchors, if properly managed, will not degrade wilderness resources and values.
- Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited.
- The Access Fund supports the ban on power drills in wilderness, and actively promotes the concept that bolts are a "tool of last resort."

### **GENERAL COMMENTS**

Mountain climbing and wilderness have a history in national parks that started long before wilderness designations. At least 30 separate wilderness bills included reference to climbing in the Congressional Record or Committee Reports when Congress debated their inclusion in the National Wilderness Preservation System. Within these areas, before they were designated wilderness, rock and mountain climbing using fixed anchors was both popular and well documented. Over 330 routes containing fixed anchors existed before Congress designated these areas as wilderness. Accordingly, DO #41 should recognize climbing and fixed anchors as a legitimate, historic, and appropriate use in Wilderness.

The language of the first paragraph of Section 7.2 quoted below is unnecessary and may diminish the legitimacy of climbing in the minds of field-level NPS wilderness managers who may not have experience with climbing management.

*Climbing is in many cases a legitimate and appropriate use of wilderness. However, any climbing use or related activity must be restricted or prohibited when its occurrence, continuation or expansion would result in unacceptable impacts or impairment to wilderness resources or character, or interfere significantly with the experience of other park visitors.*

It is already clear that the NPS has the authority to prohibit climbing where there are resource-based justifications such as sensitive species, cultural resources, and social conflicts. Climbing and the use of fixed anchors should be subject to the same management standards as other recreational activities to ensure the preservation of the wilderness character of these lands. It is

redundant and counter-productive to single out climbing when highlighting this well-established NPS authority to protect park resources.

In general the Access Fund supports the approach that climbing fixed anchor issues should be dealt with locally through the adoption of climbing management plans. We are willing to place our trust in that collaborative process. We agree that bolts should be rare in wilderness, but the National Park Service should acknowledge that climbing is a legitimate and appropriate activity in wilderness and that fixed anchors are necessary tools for wilderness climbing.

### **SPECIFIC COMMENTS**

The Access Fund believes that Director's Order #41 needs a few significant amendments. The Access Fund conditionally supports the guidance outlined in Section 7.2 provided the National Park Service clarifies specific terms and addresses the following concerns:

#### **1. Individual Parks Should Determine If Prior Authorizations Are Necessary**

We believe that individual parks are best suited to determine whether prior authorization is to be required for new fixed anchor placements, and that climbing management plans (CMPs) are the best way to deal with potential climbing impacts, including bolts and other fixed anchors. We support policies that allow climbers to replace and maintain fixed anchors for the future safety of other climbers. Requiring prior authorization for new fixed anchors through individual CMPs vs. a Director's Order rule will allow individual parks to address their own unique management challenges on their own schedule, allocate resources to the most pressing Wilderness management needs, and will eliminate the possibility of a de facto ban on new fixed anchors in parks where such a prohibition may be unnecessary.

Any requirement for new fixed anchor authorizations should arise only through and after adoption of a climbing management plan that includes a process for authorizations. We assume that this is the proper reading of the sentence "The requirements for authorization, and the process to be followed, will be effected through an approved climbing management plan." We support language stating that "authorizations may be required for the placement of new fixed anchors" but we oppose the language that requires prior authorization in every case.

#### **2. No Interim Ban**

The NPS should clarify that local parks cannot use a final DO #41 policy to restrict new anchors until a CMP and associated fixed anchor authorization process, if necessary, is finalized, implemented, and resourced (with administrative staff available to process authorizations). There have been cases of CMPs taking multiple years—some are still unresolved. The NPS should clarify that authorization requirements will be imposed only through and after a local CMP is established to avoid an interim ban on new fixed anchor placements. If prior authorization is required as of the final adoption of Director's Order #41, but authorization cannot be obtained until there is a CMP, then this too must be clarified. We oppose the adoption of a final Director's Order #41 that creates interim fixed anchor bans in all National Park Service Wilderness areas.

### **3. Climbing Management Plan Details**

If fixed anchor authorizations are to be required in a CMP, permission should be granted programmatically for specific park zones. We support case-by-case permits in sensitive areas. We believe that most parks developing a CMP and fixed anchor authorization process will conclude that it is unnecessary, burdensome, excessive, and disproportionate to require authorizations for individual routes. Section 7.2 or its associated NPS reference manual should clearly outline the options that authorizations may take.

Local CMPs may distinguish between different forms of fixed anchors, such as authorizations for different types of fixed anchors (e.g., bolts or pitons) or different needs (e.g., belays, rappels, or anchors for ascent). The policy should permit these options in local CMPs. Park planners should consult with local climbing communities on climbing management plans, in particular on boundary determinations for programmatic fixed anchor authorizations, and case-by-case fixed anchor permits for sensitive areas. The Access Fund remains committed to working with the NPS on management plans around the country to identify effective management plans that will protect park resources, continue appropriate climbing access, establish local policies that provide accountability, consistency, and continuity in the National Park Service wilderness stewardship program, and to guide Service-wide efforts in meeting the letter and spirit of the Wilderness Act.

### **4. “Sport Climbing” Language Unhelpful and Ambiguous**

The Access Fund believes that bolts should be rare in Wilderness and we support limits on bolt-intensive climbing in Wilderness areas. However, the draft language is ill-served by the inclusion of the debatable and subjective term “sport climbing.” Most people can agree on and identify bolt-intensive climbs that sometimes cause a “concentration of human activity.” However, “sport climbing” is defined in many different ways by different people. The final policy should provide some allowance for “traditional” face climbs (such as are found at Joshua Tree) that rely predominantly on fixed anchors for protection but where those fixed anchors are rare, limited in number and do not lead to high concentrations of human activity or otherwise degrade Wilderness values.

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In sum, the Access Fund supports a management approach that delegates decisions to local managers whether prior authorizations for new fixed anchors are required. By placing such decisions at the local level, rather than a national mandate, the NPS would limit unreasonable interim fixed anchor bans at parks that significantly delay—or never complete—local climbing plans that include authorization processes. If local managers do require prior authorization for new fixed anchor placements, these should be provided programmatically, unless a demonstrated resource-based need requires route-by-route authorizations. Excessive management of fixed anchors—requiring prior authorization in every case nationwide upon finalization of DO #41—would only limit the longstanding legitimate activities of a significant group and cause burdensome bureaucratic processes for local parks.

We hope that these suggestions for the management of fixed anchors in National Park Service wilderness proves helpful when finalizing Section 7.2 in the DO #41 revision. Our position is the culmination of many years of concerted efforts working not only with the climbing community, but also the outdoor industry, national wilderness advocates, local land managers, and other interested citizens. The Access Fund appreciates your hard work on this matter and we look forward to working in the future with the NPS to identify a reasonable management direction for this important wilderness climbing issue.

Sincerely,

A handwritten signature in black ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith  
Access Fund Policy Director

Cc:

The Honorable Mark Udall, US Senate  
David Brooks, Democratic Counsel, US Senate Committee on Energy and Natural Resources  
Kaleb Froehlich, Republican Counsel, US Senate Committee on Energy & Natural Resources  
Jim Streeter, Republican Staff Director, US House of Representatives Subcommittee on  
National Parks, Forests, and Public Lands  
David Watkins, Democratic Staff Director, US House of Representatives Subcommittee on  
National Parks, Forests, and Public Lands  
Climbers Stakeholder Group