



Protect America's Climbing

August 25, 2014

Woody Smeck, Superintendent  
ATTN: WSP/DEIS  
Sequoia and Kings Canyon National Parks  
47050 Generals Highway  
Three Rivers, CA 93271-9700

**RE: Access Fund Comments for Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan and Draft Environmental Impact Statement**

Dear Superintendent Smeck,

The Access Fund appreciates this opportunity to comment on the Sequoia and Kings Canyon National Parks (SEKI) *Wilderness Stewardship Plan and Draft Environmental Impact Statement (WSP)*. Sequoia and Kings Canyon National Parks wilderness provides unique, world-class opportunities for remote, adventurous wilderness rock climbing. The Access Fund, its members and supporters, and the rock climbing community at large, highly value wilderness climbing experiences and are interested in helping SEKI conserve its outstanding wilderness climbing resources for future generations.

### **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 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with nearly 10,000 members and 90 affiliates nationwide. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service in order to partner with federal land agencies on climbing management issues.<sup>i</sup> California is our largest member state and many of our members regularly travel to climb in California, including within SEKI's wilderness areas. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

### **COMMENTS**

The Access Fund commends SEKI for recognizing “climbing as a legitimate and appropriate activity for realizing unconfined and self-reliant recreational opportunities in wilderness.”<sup>ii</sup> The SEKI wilderness affords quintessential wilderness climbing opportunities that have been appreciated by adventure climbers, such as John Muir, since the mid-1800s. We are pleased that the general theme of SEKI's climbing management strategy is similar to our mission: to protect climbing opportunities and to conserve the climbing environment. We also credit SEKI for acknowledging the need to develop a

“future climbing management plan [that] would more thoroughly analyze use levels, identify significant issues, and implement detailed management actions to address all climbing related issues”.<sup>iii</sup>

The Access Fund promotes wilderness climbing ethic that encourages climbers to 1) be aware of and respect climbing regulations, restrictions and closures, 2) be self-reliant and prepared for wide-ranging conditions, 3) use removable climbing protection whenever possible, 4) get appropriate authorizations from land managers before placing fixed anchors, 5) place bolts as a last resort, and 6) follow all Leave No Trace practices. We recognize that the intent of the climbing management strategy (Appendix J) is to endorse the aforementioned principles and to provide a framework for protecting wilderness resources and character; however, the *Social Impacts*, *Hardware/Equipment*, *Public Use of Fixed Anchors*, *Administrative Use of Fixed Anchors* sub-sections contain content that is problematic with respect to visitor-use statistics, Director’s Order #41 (DO41) guidelines and wilderness climbing best practices. The *Application for Special Use Permit* (Appendix J, Attachment 1) also needs to be modified in order to reflect wilderness climbing best practices and to improve usability and relevancy. Please consider the following comments, directed at improving the climbing management strategy and fixed anchor permit system, to ensure that climbers can safely enjoy SEKI’s wilderness climbing resources, comply with wilderness climbing policy, and protect wilderness resources and character.

### **Social Impacts**

The *Social Impacts* sub-section of Appendix J is insufficient. We recommend that the *Social Impacts* section include available survey statistics<sup>iv</sup> that would provide perspective on the number of climbers, the distribution of climbing resources and the distribution of climbers across the landscape. The Visitor Use section of the WSP notes that 3% of the 25,000 – 35,000 annual overnight wilderness visitors engage in technical climbing.<sup>v</sup> This indicates that approximately 1000 climbers per year overnight in the wilderness. Previously conducted NPS sponsored research suggests that the majority of climbers visit a small percentage of available climbing sites. Site visitation is based on hiking distance, climbing route difficulty and climbing route quality.<sup>vi</sup>

Based on the number of climbers using SEKI’s wilderness (and the probable spatial distribution of climbers), it is important to recognize that climbers have an extremely low impact on other climbers and, more importantly, other wilderness visitor groups. It is also imperative to note that the vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in wilderness.<sup>vii</sup>

It is well accepted that recreation impact is a function of 1) intensity, 2) type of use and 3) environment (ecosystem)<sup>viii</sup>, so it is therefore important to not only note the type of use and environmental factors (wildlife, soils, lichen, sound, etc.), but also the estimated use-levels (intensity). Acknowledging the visitor-use statistics associated with climbing is critical in order to provide proper perspective for the entire *Impacts of Climbing And Mitigation* section of Appendix J.

### **Hardware/Equipment**

The *Hardware/Equipment* sub-section of Appendix J introduces the types of equipment that are used for technical climbing. We recommend that the definition of the term ‘fixed anchors’ be included in

this sub-section, or earlier, rather than later in the document (currently defined in the *Public Use of Fixed Anchors* sub-section). Defining the term fixed anchor is critical to a discussion on climbing hardware and equipment. We support the definition (listed in the *Public Use of Fixed Anchors* sub-section) that “fixed anchors consist of webbing, bolts, pitons, chains, and other devices and equipment permanently or semi-permanently attached to rocks (or other natural features) that are left in place after the activity”. However, site-specific policy, such as this climbing management strategy, needs to be more explicit regarding specific conditions for different types of fixed anchors (discussed in the Application for Special Use Permit comments below).

The statement, “[t]he use of fixed anchors is rarely appropriate in wilderness”<sup>ix</sup> needs to be modified in order to subscribe to DO41 guidelines and wilderness climbing best practices. Director’s Order #41 states, “[f]ixed anchors or fixed equipment should be rare in wilderness”, not that the ‘use’ of fixed anchors is ‘rarely appropriate’. This distinction is important because, through judicious placement of fixed anchors, every fixed anchor, and the use thereof, should be appropriate. The Access Fund believes that fixed anchors, and bolts specifically, should be placed as a last resort in wilderness. It is a great privilege to climb in the wilderness and every fixed anchor necessitates thoughtful consideration prior to placement. Although fixed anchors should be rare in wilderness, the placement of fixed anchors should always be appropriate and in accordance with SEKI guidelines.

The statement, “[f]ixed anchors will not be placed merely for convenience or to make an otherwise unclimbable route climbable”<sup>x</sup> also needs to be edited to reflect the fundamental purpose of fixed anchors in wilderness. Director’s Order #41 acknowledges that the “occasional placement of a fixed anchor for belay, rappel, or protection purposed does not necessarily impair the future enjoyment of wilderness of violate the Wilderness Act.”<sup>xi</sup> In other words, occasional fixed anchors may be necessary and appropriate for climbing in the wilderness. The only reason to place a fixed anchor in the wilderness is to make an ‘otherwise un-climbable route climbable’ by providing a reasonable modicum of safety. If a route is climbable (within a generally accepted risk level) without fixed anchors, there would be no need for a fixed anchor in the first place. Director’s Order #41 clearly states that bolt-intensive face climbs are not compatible with wilderness, and that bolt-intensive climbs are identified by the “concentration of human activity which they support, and the types and levels of impacts associated with those routes”.<sup>xii</sup> Therefore we recommend changing “[f]ixed anchors will not be placed merely for convenience or to make an otherwise un-climbable route climbable” to ‘fixed anchors will not be placed merely for convenience or to establish bolt-intensive face climbs that attract high levels of use and impact’.

### **Public Use of Fixed Anchors**

Although we support the statement, “fixed anchors which are currently in place may remain”<sup>xiii</sup>, we do not agree that climbers should need approval, via the proposed permit system, to replace fixed anchors. The Access Fund contends that facilitating the climbing community’s maintenance of existing fixed anchors is essential to fixed anchor management in wilderness. A programmatic authorization is necessary for replacing inadequate fixed anchors (bolts, slings, pitons, etc.) while climbing or descending a wilderness route. It is not reasonable, nor compatible with current wilderness climbing best practices, to require a climber to submit a permit in order to replace a fixed anchor while in the midst of wilderness climbing activity: “To request permission to place a new fixed anchor, replace an

existing fixed anchor, or remove an existing fixed anchor, complete the Special Use Permit (Form 10-930) application”.<sup>xiv</sup> Replacing an inadequate fixed anchor is not considered an emergency or self-rescue situation – it is simply an element of typical wilderness climbing best practices. Therefore, we recommend that the word ‘*only*’ be removed from the statement, “[t]he placement of new fixed anchors without receiving prior permission is allowed only when necessary to enable a safe means of descent in order to facilitate emergency retreat, during self-rescue situations”.<sup>xv</sup>

Wilderness fixed anchor management must also provide provisions (programmatically or case-by-case basis) to allow climbers some level of control, while in a wilderness setting, to make decisions regarding fixed anchor placements where no other options are available. Such policies allow climbers to make legal, critical decisions regarding personal safety in unforgiving conditions often experienced in rugged wilderness. Only a very small minority of climbers partake in wilderness-based first ascents that involve the placement of fixed anchors; however, the ability of climbers to place a de minimus number of wilderness fixed anchors is a privilege worth protecting because it embodies “outstanding opportunities for solitude or a primitive and unconfined type of recreation”<sup>xvi</sup> associated with the purest forms of wilderness exploration.

Lastly, the statement, “[n]ew, bolt intensive climbing routes (e.g., “sport climbs,” bolt ladders) are not appropriate in wilderness and are prohibited”<sup>xvii</sup>, needs to be qualified with: ‘bolt-intensive climbs are defined by the *concentration of human activity which they support, and the types and levels of impacts associated with those routes*’.<sup>xviii</sup>

### **Administrative Use of Fixed Anchors**

Administrative actions regarding fixed anchors must be well substantiated and noticed to the public. The Access Fund maintains that any decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment. All administrative changes to the condition of fixed anchors (e.g., removal) should be well-publicized to help mitigate potential negative impacts to climber safety. Therefore, the Access Fund recommends that the statement, “[t]he NPS, when it encounters [fixed anchors] during park operations, may remove those fixed anchors deemed unsafe, unnecessary, or intrusive to wilderness”<sup>xix</sup>, be elaborated to include a commitment to notify the public of any administrative actions with regard to fixed anchors.

### **Application for Special Use Permit**

The Access Fund recommends that fixed anchor replacements and new, semi-permanent fixed anchors (e.g., pitons, slings and nuts) do not necessitate a Special Use Permit. Special Use Permits should only be required for new bolts in wilderness. The ability to control personal safety decisions is fundamental to the self-reliant component of the wilderness climbing ethic. Programmatic fixed anchor authorization, similar to climbing management strategies at Zion<sup>xx</sup> and Rocky Mountain<sup>xxi</sup> National Parks, is an effective way to preserve the wilderness quality of “solitude or primitive and unconfined recreation”.<sup>xxii</sup>

## Commercial Guiding in SEKI Wilderness Areas

The Access Fund supports the preferred alternative's plan for allowing continued opportunities for the public to access SEKI's wilderness with an accredited mountaineering guide. Hiring a professional guide allows climbers the opportunity to experience wilderness while learning valuable safety and Leave-No-Trace skills. Carefully managing the number of and requirements to obtain a guiding permit are the best means for preserving the wilderness climbing experience within SEKI.

## Access Fund Assistance

Please contact us for assistance with wilderness climbing management at SEKI. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have proven to be a useful tools for land managers across the country.<sup>xxiii</sup> The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>xxiv</sup> or assistance from our Conservation Team<sup>xxv</sup> 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.

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Thank you for your consideration of climbing management for SEKI wilderness. The Access Fund has the experience, local contacts, and resources to help planners craft policy that encourages climbing while protecting wilderness characteristics. The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (720-588-3512) or email ([erik@accessfund.org](mailto:erik@accessfund.org)) to discuss this matter further.

Best Regards,



Erik Murdock, PhD  
Policy Director  
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director  
Scott Massey, American Mountain Guide Association

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- <sup>i</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration\\_with\\_federal\\_agencies.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm)
- <sup>ii</sup> Sequoia and Kings Canyon National Parks *Wilderness Stewardship Plan and Draft Environmental Impact Statement*, Appendix J, Climbing Management Strategy, page J-3.
- <sup>iii</sup> *Id.* page J-4
- <sup>iv</sup> WSP, Visitor Use section, page 334.
- <sup>v</sup> *Id.*
- <sup>vi</sup> Murdock, E.D. (2010). Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California (Unpublished). Doctoral Dissertation, University of Arizona.
- <sup>vii</sup> Studies indicate that the vast minority of climbers (<20% based on site specific samples) have ever placed a bolt. It is reasonable to assume that an even smaller minority of climbers have placed a bolt (hand drilled) in a remote wilderness setting based on documented climber use-patterns.
- Schuster, R. M., Thomson, J. G., & Hammitt, W. E. (2001). Rock Climber's Attitudes Toward Management of Climbing and the Use of Bolts. *Environmental Management*, 28(3), 403-412.
- Reighart, S. (2007). Rock Climber Perspectives on Management Issues in the Red River Gorge (Unpublished). Thesis, Ohio State University.
- <sup>viii</sup> Hende, J. C., G. H. Stankey, and R. C. Lucas (2005). *Wilderness management*. Honolulu, HI: University Press of the Pacific.
- <sup>ix</sup> WSP, Appendix J, Climbing Management Strategy, page J-6.
- <sup>x</sup> WSP, Appendix J, Climbing Management Strategy, page J-6.
- <sup>xi</sup> Jonathan Jarvis, Director's Order #41: Wilderness Stewardship, Section 7.2, National Park Service, US Department of the Interior (May 13, 2013).
- <sup>xii</sup> *Id.*
- <sup>xiii</sup> WSP, Appendix J, Climbing Management Strategy, page J-7.
- <sup>xiv</sup> *Id.* page J-13
- <sup>xv</sup> *Id.* page J-7
- <sup>xvi</sup> Wilderness Act of 1964, Pub. L. 88-577, § Sec. 2(c)(2).
- <sup>xvii</sup> WSP, Appendix J, Climbing Management Strategy, page J-7.
- <sup>xviii</sup> Jonathan Jarvis, Director's Order #41: Wilderness Stewardship, Section 7.2, National Park Service, US Department of the Interior (May 13, 2013).
- <sup>xix</sup> WSP, Appendix J, Climbing Management Strategy, page J-7.
- <sup>xx</sup> Backcountry Management Plan and Environmental Assessment (2007), Zion National Park, National Park Service, Utah.
- <sup>xxi</sup> Backcountry and Wilderness Management Plan (2001), Rocky Mountain National Park, National Park Service, Colorado.
- <sup>xxii</sup> Wilderness Act of 1964, Pub. L. 88-577, § Sec. 2(c)(2).
- <sup>xxiii</sup> See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>
- <sup>xxiv</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm).
- <sup>xxv</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm).