



March 11, 2022

Superintendent David Smith
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277-3597

Emailed to: david_smith@nps.gov and jotr_planning@nps.gov

RE: Comments on Joshua Tree National Park Climbing Management Plan Scoping

Superintendent Smith and Climbing Management Planning Team,

The Wilderness Society, Access Fund, CalWild, National Parks Conservation Association, American Alpine Club, American Mountain Guides Association, The Mountaineers and Friends of Joshua Tree appreciate this opportunity to provide comments during the scoping period for the proposed Joshua Tree National Park (JTNP) Climbing Management Plan (CMP). We have worked in a coalition for many years to find common ground on smart management policies that protect wilderness characteristics, natural resources and cultural values while also allowing opportunities for climbers and mountaineers to experience the solitude and beauty of wilderness areas across the country.

JTNP attracts visitors from around the world to experience the fragile desert landscape. The world-class climbing opportunities at JTNP attract more than 500,000 climbers per year and provide a unique opportunity for primitive and unconfined recreation in JTNP's Wilderness. Climbers challenge themselves on a wide spectrum of climbing routes that offer a variety of climbing styles, difficulty levels, and settings. Climbing—including the use of fixed anchors—is a historic use at JTNP and predates the first JTNP Wilderness designation in 1976. The undersigned organizations support climbing, in and outside designated wilderness, as an acceptable and appropriate use at JTNP.

Comments

Our organizations are particularly concerned with JTNP's new interpretation of the Wilderness Act that defines fixed anchors as installations. Fixed anchors, critical climbing tools used to facilitate safe ascent or descent of technical, vertical terrain, are fundamental to rock climbing. Defining fixed anchors as installations would create a presumption that they are prohibited in wilderness. This presumption will make it difficult to secure permission to maintain existing anchors and place new anchors to protect climbing routes and may also result in widespread removal of existing anchors from wilderness areas. The combined effect of these actions would be to significantly reduce climbing opportunities in wilderness and will make it much more difficult for climbers and other recreationists to support wilderness designations.

We believe this new interpretation is unnecessary. The National Park Service (NPS) already has the tools it needs to effectively manage climbing in wilderness and to develop climbing management plans that effectively protect wilderness character. Director's Order #41 (DO#41), Section 7.2, outlines clear management guidance for regulating fixed anchors in designated wilderness. DO#41 does not treat fixed anchors as prohibited installations, nor does it require a Minimum Requirement Analysis (MRA) for recreational climbing fixed anchors (although it does require MRA for administrative purposes such as search and rescue). We believe that JTNP should use DO#41 and the other management tools available under its existing authorities to manage wilderness climbing. This approach is preferable to asserting a new interpretation of the Wilderness Act that was not informed by public process and does not align with current federal policy^[1] and practice.

To be clear, we support the regulation of climbing in wilderness areas. In fact, over two decades ago the Access Fund, Friends of Joshua Tree, The Wilderness Society, and National Parks Conservation Association submitted a joint comment on the 2000 JTNP Backcountry and Wilderness Management Plan. We jointly supported management policies, similar to DO#41, that included an authorization process for new fixed anchors, restrictions that prevent damage to natural and cultural resources, and the replacement of antiquated fixed anchors without excessive administrative burden. This joint comment letter also supported a holistic approach to climbing management that does not rely on prohibiting fixed anchors as installations.

Since then, our organizations and the NPS have continued to work together in good faith to determine the best methods for managing climbing in wilderness. We made strong progress since the approval of DO#41 in 2013 and collaborated on recommendations for the Reference Manual #41 supplement (pending). Throughout our numerous discussions and conferences, none of our organizations, nor the NPS, regarded fixed anchors as prohibited installations. This included the 2017 NPS Climbing Management Conference in Tucson, AZ attended by NPS climbing and wilderness policy experts from across the country.

The national-level policy formation process that resulted in DO#41 included extensive stakeholder input, public notice and comment, and subsequent collaboration. We do not think

the agency should cast this collaborative work aside and change course in the context of a single management decision made by a single unit of the National Park Service. This is not an effective way to manage primitive and unconfined recreation within the National Wilderness Preservation System.

We do not support a reinterpretation of the Wilderness Act that treats fixed anchors as installations. Instead, we support smart, effective climbing management strategies that address the entire climbing activity, from parking areas and access trails to staging areas and the summits of climbing routes, in a manner consistent with the Wilderness Act and accepted wilderness management principles.^[2] This has been the approach taken by not only the NPS, but other federal land management agencies responsible for administering the 110 million acres of wilderness nationwide.

Instead of reinterpreting the Wilderness Act, the National Park Service should focus on implementing the tenets of DO#41 as it was adopted in 2013. We collectively stand by ready to assist in that effort. To implement DO#41, each park unit that manages climbing should prepare a site-specific climbing management plan. In preparing its plan, each unit should identify climbing routes that threaten wilderness characteristics. This process for evaluating whether climbing routes are incompatible with wilderness values should follow the DO#41 guidance.

JTNP's proposal represents a significant deviation from DO#41. The key part of the Director's Order is this statement: "The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support, and the types and levels of impacts associated with such routes."^[3] Thus, DO#41 focuses on the impacts of high use levels, the types of impacts those use levels cause, and the resulting effects on wilderness character. This approach focuses management solutions on the measurable and objective impacts of climbing routes on wilderness character. This approach is preferable to a blanket determination that fixed anchors are installations.

At a practical level, the proposed reinterpretation of the Wilderness Act will cause significant confusion and consume significant agency resources at a time when land managers are struggling to cope with staffing shortages, resource limitations, climate change and other threats to wilderness values. Under the approach proposed by Joshua Tree National Park, existing fixed anchors would be treated as presumptively prohibited. Land managers would then need to locate, catalog, and assess all of these fixed anchors to determine whether to allow them to remain in place. This would be an insurmountable task.

The proposed reinterpretation would also adversely impact climbers in significant ways. For example, this new policy could limit climbers' ability to replace and update existing anchors that are aging and outdated and do not provide adequate safety for climbers. This would have the effect of restricting climber access to many of the most iconic climbs in Joshua Tree National Park and other park units across the country, cause significant uncertainty for guides who have

historically relied on such anchors, and send the message that climbers are not welcome in wilderness.

Our organizations are also concerned that JTNP's proposed CMP will deter climbers from supporting critical conservation initiatives and alienate climbers from their wilderness roots. Many of the greatest conservation gains during the 21st century have been a direct result of the collaboration between the human-powered outdoor recreation and conservation communities. The climbing community was integral to the development and passage of the Wilderness Act of 1964 as well as the protection of wilderness areas and other protected landscapes for more than a half century. The proposed JTNP climbing management policy will affect the public's opinion of the need for conservation and have a negative and direct impact on the future of America's public lands.

It bears repeating that this coalition supports the prohibition on the use of power drills in wilderness, mandatory authorization (per DO#41) for the placement of fixed anchors, and management of other aspects of recreational use like trails and human waste management. We believe the agency would do more to protect wilderness character by focusing its limited resources on these management issues rather than reviewing every existing fixed anchor within wilderness.

We hope that JTNP will reconsider its proposal to treat fixed anchors as prohibited installations, and instead determine the best path forward is to manage recreational climbing in accordance with Director's Order 41, and to protect wilderness character utilizing the many policy tools available today.

Sincerely,

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

Paul Sanford, The Wilderness Society National Director Recreation Policy

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

Chris Winter, Access Fund Executive Director



Linda Castro, CalWild Assistant Policy Director



Chris Clarke, National Parks Conservation Association Ruth Hammett Associate Director,
California Desert Program



John Lauretig, Friends of Joshua Tree President



Louis Geltman, Outdoor Alliance Policy Director



Betsy Robblee, The Mountaineers Conservation and Advocacy Director



Taylor Luneau, American Alpine Club Policy Manager



Matt Wade, American Mountain Guides Association Deputy Director

^[1] 2013 NPS Director's Order #41, Section 7.2, Climbing

^[2] 2008, Hendee, J.C. and Dawson, C.P., Wilderness Management: Stewardship and Protection of Resources and Values, International Wilderness Foundation, Boulder, CO.

^[3] 2013 NPS Director's Order #41, Section 7.2, Climbing.