



# Public Scoping Comment Report

## Joshua Tree Climbing Management Plan

July 2022



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- A Summary of Comments Previously Received During Civic Engagement
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# 1. INTRODUCTION AND BACKGROUND

The National Park Service (NPS) is preparing an environmental assessment (EA) for a climbing management plan, which also considers bouldering, highlining, and slacklining, for Joshua Tree National Park. An environmental assessment is being completed in compliance with the National Environmental Policy Act (NEPA) to provide the decision-making framework that analyzed a range of alternatives and evaluates potential issues and impacts. This plan will also be conducted in accordance with section 106 of the National Historic Preservation Act (NHPA) and other applicable laws, regulations, and policies. This report summarizes comments, feedback, and input received from the public from April 14 through June 13, 2021 during scoping for this plan/environmental assessment.

Scoping was conducted by a team of NPS planners, scientists, archeologists, and managers from the park as well as the Washington Office, Environmental Quality Division, and assisted by contractors. Scoping involves presenting the broad outlines of a project and soliciting input as to issues, concerns, and opportunities that might arise from the proposed action. Scoping is a process that federal agencies pursue in the early stages of preparing environmental analyses. Scoping is intended to encourage public participation and solicit public input on the scope and significance of a proposed action (see the *Code of Federal Regulations*, Title 40, Part 1501.7). Comments received during scoping help the National Park Service identify issues and concerns, and allows the agency to develop effective alternatives.

## 2. SCOPING PROCESS

Public scoping is a process, not an event or single meeting. The process involves gathering information from stakeholders, interested individuals or organizations, local societies, and environmental groups. As described in the Council on Environmental Quality's *Memorandum: Scoping Guidance* (1981), the objectives of scoping are to identify the concerns of the public and agencies involved, prepare for the completion of an environmental document, ensure that all related permits and reviews are completed, define the issues and alternatives that will be analyzed, and to accomplish these tasks in a timely manner. The goal is to ensure the environmental document (in this case an environmental assessment) adequately addresses relevant issues.

### 2.1 PUBLIC PARTICIPATION

Public participation is the involvement, as early as possible, in the NEPA process of persons and organizations having an interest in any activity that must meet the requirements of NEPA. Public participation also includes the efforts of personnel to locate and involve the public.

#### CIVIC ENGAGEMENT

The park held a civic engagement period during pre-NEPA activities for the plan. The park published and distributed a newsletter and held a virtual public meeting, including a question and answer session, on April 20, 2021 <https://www.youtube.com/watch?v=ZsFSWgp3jQs>. The park has also held several smaller climbing stakeholder meetings and ones including tribes. Public comments were accepted from April 14 to June 13, 2021. The park hosts and maintains a climbing plan website <https://www.nps.gov/jotr/getinvolved/climbingplan.htm> and a Planning, Environment & Public Comment (PEPC) web page <https://parkplanning.nps.gov/projectHome.cfm?projectID=90517>. The park solicited comments with a series of leading questions posted to PEPC. Questions prompted the public to consider issues related to the purpose and need of the plan: social trails, potential impacts to sensitive cultural resources, climbing and fixed anchors in wilderness, fixed anchor replacement, visitor experience effects from fixed anchor presence, fixed anchor placement/replacement permitting criteria, and the option to comment on anything not otherwise specified. A summary of the results of public comment and the civic engagement newsletter are provided in appendix A.

#### SCOPING

On January 13, 2022, the park launched a 45-day public scoping period, including a request for public input on potential management actions to improve the management of rock-based recreation. The park held a virtual public meeting on February 8, 2022 <https://www.youtube.com/watch?v=bYIZp7agSk8&t=16s>. The park also posted a newsletter and a GIS-based story map on the park's climbing plan website <https://www.nps.gov/jotr/getinvolved/climbingplan.htm>. On February 18, the park extended the public scoping comment period by two weeks based on public interest in the plan. The comment period ended on March 13, 2022. The newsletter is provided in appendix B.

### 3. METHODS

Comment analysis is a process used to compile and combine similar public comments into a format to be used by decision makers and the planning team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to NEPA regulations. It also aids in identifying the alternatives, topics, and issues to be evaluated and considered throughout the planning process.

The comment analysis process includes five steps:

- Develop a coding structure.
- Use a comment database for comment management.
- Read and code public comments.
- Interpret and analyze the comments to identify issues and themes.
- Prepare a comment summary.

A coding structure was developed to organize comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves.

The NPS Planning, Environment & Public Comment (PEPC) database was used to manage the comments. The database stores the full text of all correspondence and facilitates comments to be coded by topic and issue. The database also includes tools and reports including tallies of the total number of correspondences and comments received, sorting and reporting comments by a particular topic or issue, and demographic information for the sources of the comments.

A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, fax, written comment form, note card, open house transcript, or petition. Almost all correspondence were entered directly into PEPC by the commenter. A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or an opinion debating the adequacy of the analysis.

All correspondences were read and assigned a code to all substantive comments within the correspondence. “Substantive comments are comments that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the environmental assessment.
- Question, with reasonable basis, the adequacy of environmental analysis.
- Present reasonable alternatives other than those presented in the environmental assessment.
- Cause changes or revisions in the proposal.

In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.”

One or more **concern statements** (written summaries) were written for each code that summarizes the comments received. The concerns were expressed with an introductory general theme and then supplemented the theme with specifics. Representative quotes were included directly from the comments.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report has limitations. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote counting process, and the emphasis was on

the content of the comment rather than the number of times a comment was received. This report is intended to be a summary of the comments received rather than a statistical analysis.



## 4. COMMENT SUMMARY

The park received 4,184 correspondences. This total included approximately 11 form letters. A form letter is where correspondences match each other and are greater than 85% alike in content. Of the 4,184 correspondences, approximately 2,883 (68%) correspondences were from form letters.

**Table 1. Number of Substantive Comments by Topic**

Topic	Number of Substantive Comments
Erosion	2
Vegetation	9
Archeology Resources	9
Sacred Sites	13
Appeals	4
Chalk	3
Climbing Style Matrix	27
Bouldering	25
Environmental Justice	1
Commercial Use / Guiding	38
Implementation Logistics	30
NEPA	5
Socioeconomics	5
Treatment Areas	2
Trails	70
History	33
Safety	287
Fixed Anchors in Wilderness: Should be Allowed	318
Fixed Anchors in Wilderness: Should be Prohibited	540
Fixed Anchors in Wilderness: Existing Anchors Should be Removed	15
Fixed Anchors in Wilderness: Existing Routes Should not be Removed	85
Fixed Anchors in Wilderness: Should be Managed	337
Fixed Anchors in Wilderness: Existing Should be Maintained, New Anchors Should be Prohibited	13
Fixed Anchors in Wilderness: Law and Policy	490
Fixed Anchors: Permitting	136
Motorized Drills in Wilderness: Should be Allowed	6
Motorized Drills in Wilderness: Should be Prohibited	185
Motorized Drills in Wilderness: Should be Managed	9
Wilderness	125
Wildlife	12
<b>Total</b>	<b>3,050</b>

## 5. CONCERN STATEMENTS

Concern statements, summarizing comments received by topic, are presented below. Representative quotes, directly from the comments, are also provided. Quotes have not been edited for spelling or grammar.

### 5.1 NATURAL RESOURCES

#### GEOLOGIC FORMATIONS

**Concern Statement:** Commenters expressed concern that installing fixed anchors can damage geologic formations (rocks) by introducing human-caused accelerated fracturing and erosion.

**Representative Quotes:**

- “Once any part is harmed or even destroyed (such as allowing ATVs anywhere in the park and permanently implanting rock-climbing tools into rocks), that’s it, a micro-start to erosion that might be the start of bigger degradation.”
- “These tools and methods of climbing cause fractures in the stone and will grow bigger with cold/hot weather. This means the rock will start to disintegrate over time and much of the beauty of the landscape will start to dissolve into fragments and dust.”

#### VEGETATION

**Concern Statement:** Commenters provided suggestions on managing climbing effects on vegetation:

- Protecting vegetation should be one of the priorities of park users and park management. Social trails must be managed better to protect plants via signage and maintenance.
- Use of fixed anchors can prevent damage to trees as compared to the use of slings and webbing as temporary anchors that can damage trees.
- Guiding companies have the knowledge to safely navigate around plants.

**Representative Quotes:**

- “THERE SHOULD BE AN EXCEPTION FOR GUIDING COMPANIES AND THEIR STAFF TO OPERATE IN WILDERNESS AREAS BECAUSE WE HAVE THE KNOWLEDGE, EXPERIENCE AND TRAINING TO: 1.) Safely navigate through these areas and keeping in mind the flora and fauna of the area such as cryptobiotic organisms.”
- The Stronghold Climbing Gym - “For the protection of plant life, climbers' social trails must be managed better through clear trail marking, signage and maintenance.”
- “Protecting wildlife and vegetation, (especially in a climate such as Joshua tree) should be the priority of park users and the stewards of the land.”

**Concern Statement:** Commenters provided suggestions on managing climbing effects on sensitive plants:

- Climbers removing and trampling rare plants in rock cracks is a concern.
- Areas should be closed to visitors if sensitive plants are present.

**Representative Quotes:**

- “Many rock crevasse dwelling plants have very limited populations and ranges, and their populations can be significantly affected by clearing and trampling by climbers.”
- “Climbing anchors protect natural features, particularly trees, from damage that would occur during the creation and use of temporary anchors using slings and webbing. Climbing areas all over the

country use fixed anchors to minimize the impact of climbing activities. Nylon and Dynema webbing can damage trees and rock formations and are more obtrusive than well placed fixed stainless-steel anchors. Synthetic anchor fabrics tolerate outdoor conditions poorly over time, and the need for constant reinforcement and replacement leads to increased plastic waste in the park.”

- “If certain areas should be off limits for the purpose of protecting sensitive flora/fauna, then these areas should simply be closed to ALL human visitors.”
- “Protecting wildlife and vegetation, (especially in a climate such as Joshua tree) should be the priority of park users and the stewards of the land.”

## WILDLIFE

**Concern Statement:** Commenters expressed concern for climbing impacts on sensitive wildlife and habitats, and suggested that that park use the most current, science-based information for protecting nesting raptors, including the Access Fund's handbook on raptor management.

### Representative Quote(s):

- “This is also a sensitive eco system that supports animal and other plant life. There are also endangered species that only dwell there like the Mojave desert tortoise. Their habitat range includes the Joshua Tree National Park.”
- Access Fund – “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 - “Access Fund recently published a handbook on raptor management. 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, UFWA, 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.”

## 5.2 CULTURAL RESOURCES

### ARCHEOLOGICAL RESOURCES

**Concern Statement:** Commenters provided suggestions on managing climbing effects on archeological resources:

- The climbing community needs to take responsibility for and mitigate climbing impacts, as well as close areas where necessary.
- Climbers have many options for where to climb, so that they can afford to give up some locations.
- The park should thoroughly survey cultural sites.

### Representative Quotes:

- Cliffhanger Guides – “Climbing can doubtlessly impact cultural and natural resources, primarily through access trails and trampling of vegetation and soils, but also by climbing too close or establishing fixed anchors on rock that has cultural significance that may be damaged by the act of climbing or bolting, or simply bring too many people to a sacred or historical location. I believe that the climbing community needs to answer for some of its actions and take responsibility for the impacts we create and mitigate them or close climbs in some areas that are particularly sensitive or special. We have many options for where to climb so we can afford to give up some locations. Mostly people want to behave with respect but there have been several egregious acts of bolting in other locations right over the top of rock art or impacts to cultural sites created by traffic and social trails.”
- “I also believe petroglyphs and other culturally significant sites deserve a thorough survey to ensure their survival even if that means restricting access to certain areas.”

## SACRED SITES

**Concern Statement:** Commenters provided suggestions on managing climbing effects on sacred sites:

- The park could implement cultural resources visitor education programs, including use of the local tribes as educators.
- The park should specify in the plan how the park would involve tribes in decisions.
- The park should demarcate and protect any culturally significant sites and their vicinity.
- The park closing cultural resources sites to climbing or implementing mitigation is appropriate.
- The park should give local tribes as much control over the land, climbing access and use, as possible.
- The park could donate a percentage of entrance fees to local tribes or a relevant non-profit organization.

## Representative Quotes:

- “The last proposed objective is to improve incorporation of the values of traditionally associated Native American communities. It's stated in the JOTR CMP newsletter, that under the National Historic Preservation Act, oversight has been delegated to states. The park has a proposed agreement with the California State Historic Preservation Office to take into consideration historic property during the implementation of the climbing plan. I think this is a good step to include Native American community values into the park. I'd also suggest the implementation of a cultural program, similar to the one done in Acadia National Park. Free events that are open to the public could be hosted in the park that feature nearby tribal members. Besides instilling Native American values into management, this would also give the chance for guests to learn about the local Native American community.”
- “A recommendation for improvement in the 2022 Management Plan is to develop the Native American involvement. The management plan does not specify how the Native Americans who protected JTNP land for so long will be involved in these decisions and regulations. Due to the National Historic Preservation Act (NHPA), the park is required by federal law to analyze how these rock-based activities impact historical land and the Native Americans associated with said land (NHPA 1966, 470). Under the NHPA Section 106, it is required that federal agencies, such as the NPS, must work alongside the State and Tribal Historic Preservation (THP) Officers to plan for any adverse effects that this new proposed management plan may have on historic or tribal land (NPS 2016).”
- “Indigenous Cultural History: It goes without saying that we are guests in this land. Whatever your beliefs, the time spent in the national parks should be respectful of not only those currently around

us, but of those that were there before us. Any culturally significant sites and their vicinity should be clearly demarcated and left alone under all circumstances.”

- Access Fund – “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.”
- “CULTURAL RESOURCES I applaud the park for including local Native American tribes in this planning process. Locations with significant cultural resources have and continue to be closed to climbing. If other discrete areas are identified where cultural resources and climbing collide, I support mitigating the issue, even if it means closing or eradicating some climbs.”
- “...I would like to share some thoughts on ways JOTR can continue to build better relations with the local native community. I believe that in all decisions, much like this CMP, the local indigenous community should be included. Further, there should be a group that partners with the local communities to create more opportunities to represent and honor the people who stewarded this land for so long. As climbers, outdoor enthusiasts, we have much to learn from native people. It is important the park continue to honor and share practices of the native community- -including forbidding some areas to climbing or otherwise because of how sacred it may be to these communities. JOTR visitors have increased exponentially to better dedicate to indigenous communities JOTR could dedicate one day where all visitor costs or a percentage of visitor fees are donated to the local tribes or a non-profit of their choice. This would set an example of not only providing them a platform for others to learn but also acknowledge that financial restitution is another way we can give back to these communities who lost their land.”

## HISTORY

**Concern Statement:** Commenters indicated concern regarding the plan’s potential impact on climbing history:

- The plan could result in the removal of bolts and routes that were important to the development of American climbing.
- The plan could result in the removal of bolts and routes that may contribute to the history of American climbing.
- Recreation is to be, "fostered in management and designation of wilderness areas."

## Representative Quote(s):

- “I am very worried about this proposal, especially given the potential outcomes at Joshua Tree National Park and extending to other National Parks were the proposed new guidelines to be adopted. Within Joshua tree, it would jeopardize climber safety by prohibiting the maintenance of aging fixed anchors; it would result in the removal of existing routes--as a result of analysis by NPS staff or by climbers' bolt replacement requests--potentially including era-defining routes that are

important to the history of American climbing, such as Tony Yaniro's Ionic Strength, \*legally\* established in 1983.”

- “Climbing is an historic use recognized by congress when it enacted the wilderness act and recreation is to be fostered in management and designation of wilderness areas.”

### 5.3 ACCESS TRAILS

**Concern Statement:** Commenters provided suggestions on managing access trails related to climbing:

- The park has proposed too many trails in the plan.
- The following climbs have a lot of social trails: Headstone Rock, Coarse and Buggy, Comic Book, White Cliffs of Dover, Peyote Cracks (to and from Hidden Valley Campground), Vector, and Equinox.
- The park should include the climbing community in decisions regarding trails.
- Rocks are effective for delineating trails.
- Park staff, accompanied by climbers, could GPS preferred trails to climbs, and the park make publicly available the gps tracks for climber use.
- The park should use organized volunteer labor for trail improvements and maintenance, especially using local climbing organizations.
- The park should include a list of proposed trails in the plan.
- Data is needed related to whether social trails are caused by climbers or other visitors.
- Rap anchors at the top of formations can reduce social trailing associated with walk-offs.

#### Representative Quotes:

- “... I think there are too many proposed formal trails. I think a lot of the proposed trails could be rehabilitated.”
- Hidden Valley Dirtbags – “As for trailwork, there are several ultra-classic climbs that have SO many social trails. I believe some of the most pressing are as follows: Headstone Rock, Coarse and Buggy, Comic Book, White Cliffs of Dover, Peyote Cracks (to and from Hidden Valley CG), Vector, and ESPECIALLY a trail to Equinox.”
- “Trails, living soil, and vegetation are another concern. During the Zoom meeting, someone suggested having rangers walk trails with climbers so the preferred trail could be established and known by climbers. I think this an absolutely fantastic idea! Together with climbing guides, rangers could walk to popular crags and record a GPS track to be shared on the JTNP website, Mountain Project (a place climbers share information about climbing routes, including approach trails), and guidebook authors. With this information online, climbers could discover the least impactful and fastest way to each crag. Rangers or Stewards could still host walks from Climber Coffee, but I think online GPS tracks are more practical long-term.”
- “I'm all in favor of closing inappropriate social trails and I will gladly volunteer to help.. Perhaps more trail signs- -like the brown Access Fund posts- -can be installed. And line more trails with rocks to better delineate the trail. Finally, maybe put more signage at the parking lots to encourage folks to follow marked/established trails.”
- “Social Trails must be managed better through clear trail marking, signage and maintenance. This can be done through better utilization of volunteer labor to facilitate maintenance and responsible use of OUR Park.”

- “Social trails at Joshua Tree were identified as a significant problem in the 1993 Climbing Management Plan. Prior to the 1993 plan being finalized, the park allowed some Carsonite trail markers and signage to be installed to try and stop the spread of trails. Additionally, parking areas were positioned, curbed and some fenced to try and funnel people onto singular trails to cliffs. Almost nothing has been done since to address social trails. Some rocks have been brought in to delineate trails, but this effort has been half-hearted and generally ineffective.”
- “In this new plan, the park again identifies social trails as an issue (but crazily, far below the level of effort they have expended on fixed anchors). BUT, staff claim that until the social trails are added as official trails into the park inventory, nothing can be done about them. This is nonsense. The 2000 Backcountry Management Plan adopted many miles of trails into the fold. Certainly, this plan, which is going through the compliance process, could solve the social trail issue. It would take but 20 minutes of typing to list 50 obvious social trails leading to major climbing formations (Saddle Rock, Hall of Horrors, Echo Rock, etc.) and add that list to the proposed plan so that the trails could be added into the park's list of formal trails. The Access Fund and local climbing organizations have repeatedly offered money, expertise and manpower to solve this social trail problem with little engagement from the park.”
- “I believe that additional data is needed to make informed policy decisions and ensure that policies accurately target desired outcomes and users. While I support trail management, actual data that compares and correlates the use of "climber trails" by climbers vs. non-climbers is needed. For example, what percent of non-climbers use "climber trails" to access and hike to various areas of the park that are also being used by climbers? Are policies that target the regulation of climbing trails and climber impacts correctly attributed to climbers or would they be better attributed to non-climbers accessing areas also used by climbers? Policies and regulation must be accurately attributed to the root cause of the problem to be solved. The distinction is subtle but noteworthy for the preservation and administration of wilderness areas for the use and enjoyment of the American people.”
- Cliffhanger Guides – “User trails in the park are a mess. The Park Service and the Climbing community must work together to figure out how to consolidate climbers access to a healthier trail system. I recommend volunteer project to off set the labor. Working together we can do this!”  
 “Funding for crag trails/signage and clear trail markers can cut down on social trails and provide clear guidance on how to get to, and off of climbs. Additionally, creating rap anchors at the top of formations can reduce impact created by walk-offs and can often be a safer option.”

## 5.4 SOCIAL RESOURCES

### SOCIOECONOMICS

**Concern Statement:** Commenters provided observations on socioeconomic impacts of climbing and potential impacts from the proposed climbing plan:

- Climbers have an economic impact from spending money in the surrounding communities.
- The proposed plan could lower park visitor rates and have a negative impact on the local economy.

#### Representative Quotes:

- “Additionally, banning fixed anchors would also substantially lower your park visitor rate - which would have a direct impact on the local economy.”
- “I think it's worth noting the economic benefits of climbing to the small, rural communities that encompass these landmarks. I personally have spent probably thousands of dollars since I have

started climbing in rural towns on the outskirts of national parks, in park passes, groceries, cafes, gear, guides or guidebooks. This sport is becoming more mainstream, especially since its Olympic debut, which means a wider echelon of the socio-economic spectrum is using climbing to experience parks and being activated to invest in protecting these spaces.”

- The Climbing Stewards – “I hope that Joshua Tree National Park will consider for its Climbing Management Plan an increase in funding for Climbing Management to a proportional level to the user base, approximating 20% of visitation. Climbers bring a significant economic and cultural benefit to the Park and it's surrounding communities, and we contribute to the support of Park climbing resources on a significant level as well. It's time for climbing in Joshua Tree to receive the support it needs.”

## ENVIRONMENTAL JUSTICE

**Concern Statement:** Commenter suggested that an unintended consequence of removing sport routes from wilderness could be a disproportionate impact on people from marginalized communities due to access being limited to advanced climbers. The commenters suggested that this group of people have not historically benefitted from access and climbing instruction and are only just now entering into the community in large numbers.

### Representative Quote:

- Access Fund – “The proposed model for wilderness fixed anchor management also presents an equity issue. Runout, dangerous routes are inherently inaccessible to most climbers due to the level of skill they require to climb and the level of risk the climber must accept in order to attempt them. But under the current proposal, over time, many if not all of of JTNP's remaining fixed anchor-protected wilderness climbing that is deemed inappropriate in wilderness would fall into this category, either because fixed anchors and routes will be removed or because JTNP will not allow aging fixed anchors to be maintained by the climbing community. This would, in the long term, make JTNP's wilderness climbing considerably less accessible to any climber without years of experience and practice, and with climbing growing at a significant rate (and JTNP located a short drive from Los Angeles and other major metropolitan areas), this also means that a significant proportion of climbers visiting JTNP will have reduced opportunities to experience the backcountry, at least safely. This again runs directly counter to the purposes and protected uses for which Congress designated in the Wilderness Act almost 60 years ago.

Newer climbers having less access to the JTNP backcountry also creates a compounding equity issue. With climbing diversifying quickly, younger climbers - and thus those with fewer years of experience - are more likely to identify as Black, Indigenous, people of color, and women than ever before in climbing's history. Thus, the proposal to manage fixed anchors based on the number of fixed anchors per route or risk to the climber may have a disproportionate impact on people from marginalized communities who have not historically benefitted from access and climbing instruction and are only just now entering into the community in large numbers. These folks are more likely than other climbers to face reduced access to wilderness climbing under the current proposal, at a time when it is critical to ensure that these new climbers feel able to access all of what climbing has to offer. We urge JTNP to consider this unintended consequence as managers continue to build out the CMP.”

## 5.5 BOULDERING

**Concern Statement:** Commenters stated that bouldering is just as important as rock climbing:

- The earliest climbing guidebooks mentioned bouldering, and bouldering-specific guidebooks existed before they began rock climbing. Bouldering is a fundamental part of rock climbing.



- Bouldering has a long tradition in Joshua Tree and is equally important as roped climbing as a venue for access for park users.
- Bouldering is the single largest component of the rock climber population and has increased the diversity of the sport and made it accessible to a wider demographic of people.
- Bouldering has helped introduce a wider demographic to the park and public lands in general.

### **Representative Quotes:**

- “The mention of bouldering as an activity that has not been considered for validity. This is totally silly, as the earliest climbing guidebooks mentioned bouldering, and bouldering-specific guidebooks existed before I began rock climbing. Basically, bouldering is a fundamental part of rock climbing, and I'd hope that the new management plan will recognize this. Certainly, there are concerns regarding the overuse of crash pads and their resulting negative impacts on the park's natural resources, so I support some form of management, combined with education, signage, outreach (especially to the indoor climbing gyms, as many have no programs to help a gym climber become a responsible outdoor climber).”
- “Bouldering has a long tradition in Joshua Tree and is equally important as roped climbing as a venue for access for park users.”
- “Bouldering has been gaining attention in Joshua Tree in the past few years and it does have some impacts like lowering the sand level and squishing some plants. Although a certain amount of this can't be completely avoided, it will not be more than what is caused by non-climbing tourists wandering through the bushes to take selfies, set up picnics, etc.. Designated pad areas for popular/delicate boulders and areas can be easily created with see volunteer help from the community. Setting up a volunteer page and asking for help at the twice weekly climber coffee will be sure to get plenty of volunteers. Additional signage around boulders and in popular areas would be helpful as well. If people know what plants are around them and some of their qualities, they are far less likely to damage them.”
- Cliffhanger Guides – “Bouldering is the single largest sub-sect of the rock climber population. The park service must work to better educate boulders on their impacts (and how to avoid) while recreating in JTNP.”
- “While bolts and bolting have gotten a much of the attention in discussions about wilderness in the climbing plan, I am much more concerned about the impact of climbing pads on areas that are not already vegetation-stripped. Restrictions on pad use or boulder-problem development in wilderness areas, far more than restricting rebolting, would go far in preserving wilderness resources for future users of the park.”
- “I want to point out that bouldering, as a subset of the sport, has increased the diversity of the sport and made it accessible to a wider demographic of people. I think in turn that has helped introduce a wider demographic to the park and public lands in general. On the whole I think this is a really positive thing! People are getting outside and getting to know our public lands as places they care about. I would advocate for outreach about climbing impacts that is friendly, approachable and informative, rather than penalizing. Maybe local guide services could partner with the park to help with outreach + discuss gym to crag etiquette. Lots of people getting into climbing now are accessing it through gyms, so they may not be as familiar with “no trace” principles that are more common in outdoor recreation circles. I think people want to do the right thing, they just don't know what that is if they are new to a place.”
- “I strongly feel that bouldering is an important part of climbing and Southern California climbing history. Stopping one's ability to explore new boulders is eliminating a huge part of the future history

of bouldering. Highlining is also a way I love to adventure in the park. It's a beautiful, indescribable experience that I feel every person should have the ability to access if they want. The rules that I know of which are in place make sense to me. No lines over roads, campgrounds, and no leaving lines up overnight. Slack lining should only be done using natural protection (i.e slinging a rock) or using cams in a rock. There is no vegetation in Joshua tree that can be used to slack line. And shouldn't be."

**Concern Statement:** Commenters stated that bouldering needs to be regulated to avoid impacts to natural resources:

- Crash pads are overused and have resulted in negative impacts on the park's natural resources. They should be regulated.
- The park should have a bouldering specific permit that requires leave no trace and local ethics training by the park staff.
- The park should limit the number of people who can congregate for bouldering since the impact is amplified by the social aspects, with several people congregating in small areas, trampling soil and vegetation.

#### **Representative Quotes:**

- "There are a few ethics that climbers could promote and encourage throughout the park that can preserve a sense of wilderness. Bouldering pad placement is also important. As bouldering becomes more popular and groups become larger, we need to strongly push for folks to only place pads, stage gear, and stand in places that do not damage plants or living soil. Again, climbing advocacy groups need to be included for this to happen."
- Cliffhanger Guides – "The single climbing activity that I believe causes the most impact to natural resources is bouldering where the use of large pads to cushion falls results in the crushing of vegetation, compacting the soil and reducing its capacity to support vegetation and absorb water. Coupled with the social nature of bouldering which tends to result in climbing in large groups with multiple pads, these areas see some of the highest climber-specific impacts. I would support no crash pads in wilderness as a management option but that will likely be a very unpopular stance and difficult to enforce."
- Cliffhanger Guides – "Bouldering is the highest impact climbing activity to vegetation and soil resources. The use of crash pads on the ground to cushion falls crushes vegetation and compacts soils. All of the popular areas for bouldering in the park show significant impacts and vegetation loss. This should be relegated to areas that have already been damaged and we should consider no crash pad use in wilderness since it is impossible to not damage vegetation with a crash pad. This will not be a popular stance or easy to enforce, but it might help contain the damage done to resources."
- "Please please ban bouldering pads! I have lived and climbed in Joshua tree for over 45 years and in the 70's placed some bolts by hand from the ground up, but the damage by bouldering pads is overwhelming. When we bouldered in the past with out pads, we caused some de-vegetation but nothing like we have seen since the introduction of pads being placed and dragged around every boulder someone chooses to climb. Interestingly having been apart of EMS locally I do not believe that pads have reduced the number of fall injuries at all. Anyone arguing that bouldering without pads is more dangerous does not know the history of bouldering in the park."
- Access Fund – "Individual Bouldering has increased significantly 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. Boulderering 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 boulderering 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. During the public meeting there was discussion on potential "pad zones." Access Fund and FOJT are willing to assist JTNP in establishing criteria for these zones. The concept of "pad zones" could potentially apply to areas where rare plant species may grow at the base of a boulder problem, or where Indigenous cultural sites may be present. Boulderering (like all forms of climbing) should be managed appropriately to mitigate impacts, in a targeted and specific manner. Boulderering 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 boulderering impacts."
- "While I am a climber, I was to express my concerns regarding the apparent and significant impact of boulderering on wilderness. In particular, the placement and use of boulderering pads--often many of them over a large area--has a detrimental effect to the soil and vegetation in the park. This is, in many cases, amplified by the social aspects of boulderering, with several people congregating in small areas, trampling soil and vegetation. The plan should take these aspects into account and consider whether boulderering (in particular, with crash pads) is incompatible with wilderness, or specific areas of wilderness."

**Concern Statement:** Commenters suggested that boulderering doesn't need to be regulated:

- The park should not regulate or restrict crash pads in any way because it is essential to have the freedom to use all necessary safety equipment at all times.

**Representative Quote:**

- "Crash pads should not be regulated or restricted in any way. It is essential that we have the freedom to use all necessary safety equipment at all times."

**Concern Statement:** Commenters provided suggestions on managing human waste related to climbing:

- Guiding companies have the knowledge, experience, and training to instruct their guests how to appropriately dispose of human waste in wilderness.
- The park should include measures in the plan to address how climbers manage human waste in wilderness and related public education. The commenter suggested use of "Restop" or "Wag Bags."

**Representative Quote:**

- Access Fund – "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 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. We suggest JTNP consider how they want climbers to manage their waste in the backcountry and include such considerations in this CMP along with strategies for public education."

## 5.6 CLIMBING MANAGEMENT IN WILDERNESS

### WILDERNESS ACT

**Concern Statement:** Commenters suggested that the Wilderness Act is not subject to interpretation and that wilderness should not have permanent bolts:

- Commenters stated that not every rock face in the park needs to be climbed.
- Commenters stated that if a rock face cannot be climbed without permanent bolts it should not be climbed.
- The park should follow and enforce the Wilderness Act.
- The park must protect wilderness.
- The park must keep wilderness wild.
- The park should not allow permanent, fixed anchors because they are inconsistent with the Wilderness Act.
- The park should not allow permanent, fixed anchors as they permanently deface the rock.
- The park should not make exceptions for a small group of people (climbers).

### **Representative Quotes:**

- “The Wilderness Act should be followed as currently written”
- “I write as someone who has climbed and loves climbing still - but please leave wilderness areas as unspoiled as possible.”
- “Keep wilderness areas wild.”
- “Nothing requires that all rock faces in Wilderness must be climbable; if a rock face within the Wilderness isn't climbable without defacing it with permanent fixed anchors, then climbers shouldn't try to climb that face. Other Wilderness visitors should be able to experience the Wilderness without seeing rock faces defaced by permanently installed climbing hardware.”
- “The Wilderness Act is landmark legislation not to be applied selectively when convenient with exemptions of any kind for any reason for any party's special interest.”
- “Wilderness should be just that, wild.”
- “These rock structures must remain whole and not defaced. Climbers have many other places already pinned that they can go to. Wilderness should be left as it is.”
- “Before you know it, people will be driving into the Wilderness and using their Jeeps for belaying anchors”
- “Additionally, installed anchors (that will invariably be left behind) or drill marks leave a scar on the landscape. No one wants to see this when in the Wilderness.”
- “There are already a significant number fixed anchors located throughout the Joshua Tree National Park wilderness areas. These are inconsistent with wilderness as defined by the Wilderness Act. Visitation at JOTR has increased exponentially in the past ten years and more visitors are venturing into wilderness areas of the park for activities other than climbing. These fixed anchors detract from their wilderness experience. Allowing additional anchors would make a bad problem even worse.”
- “As a small group of stakeholders, rock climbers should not be allowed to endanger the delicate ecosystems and deface the wilderness, thus penalizing the majority of stakeholders in wilderness who prefer to enjoy it as nature intended.”
- “Strictly enforce the Wilderness Act!”
- “Keep wilderness as wilderness.”
- “I am writing in strong support for the NPS determination that fixed climbing anchors are installations under the Wilderness Act.”

- “Please uphold the provisions of the Wilderness Act and protect all wilderness areas according to the meaning of “wilderness”.”
- “I strongly support our Wilderness Preservation System and believe that it is our duty to preserve all designated Wilderness areas for future generations of Americans to experience as we can. I believe in strong management regulations that fully protect the Wilderness as defined by the 1964 Wilderness Act.”

**Concern Statement:** Commenters suggested that permanent fixed anchors are not incompatible with the Wilderness Act:

- The National Park Service should not be changing its interpretation of the Wilderness Act.
- The National Park Service should recognize that climbing is a legitimate, appropriate, and historical use of wilderness.
- The National Park Service should honor the spirit of the Wilderness Act but be open to compromise and flexibility.
- Climbing brings people into wilderness and exposes them to it.
- The park should not be targeting a specific group of people (climbers).

**Representative Quotes:**

- “There's no reason for JTNP to make unprecedented changes to the longstanding interpretation of the Wilderness Act when current NPS policy and management authority already provides sufficient guidance for managing climbing in Wilderness areas.”
- “The recently announced management plan seems intended to restrict a specific group of wilderness users with little regard for overall impacts and important fact that wilderness is still meant to be used by tax payers for their pleasure in isolation and cohabitation with nature.”
- “The Frank Church River of No Return Wilderness which - if I may point out - falls under the Wilderness Act. Allowed within the boundaries of this Wilderness are motorized jet boats on the Salmon River, the preservation of historic cabins and structures, landing strips and the use of those landing strips by airplanes. Without the flexibility afforded by the Wilderness Act, there would be no River of No Return Wilderness.”
- “Please don't allow these changes to happen to a place that has brought wilderness enthusiasts together without consulting all stakeholders in this area.”
- “Besides the above mentioned points, the climbing management plan worries me personally as person who grew up climbing in “monument” with my dad, uncle, and mentors. The lessons and ethics taught were always strict and leave no trace based. The idea being that you could go and test yourself on the exact swaths of stone that those before us had. The spirit of adventure and history all wrapped up in one. The wilderness happens to be one of those areas that the modern adventurer and stewards of history can find solace and adventures of their own. These last bastions of little explored rock are few and far between and with appropriate regulations and guidance, this generation and those to come will have the opportunity to leave a positive mark on climbing history in Joshua Tree. To ban bolts/permanent anchors outright, as well as vague outlines of what constitutes a “route” versus “bolted routes” in wilderness sets a dangerous precedent for erasing historical routes in other National Parks.

This CMP has many things well done, but also presents a slippery slope that could trigger a landslide of harmful regulations to many user groups. With climbing becoming such a popular way to experience the outdoors, these regulations could deter climbers from experiencing the historical

routes and beautiful vistas that climbing in National Parks provides. These same vistas that we as tax paying citizens have the right to access.”

- “Climbing brings people to the wilderness. It allows us to experience nature in a physical yet beautiful way. Climbing is apart of wilderness culture. To exclude it means to criminalize something that does no harm.”
- “I saw you guys went over the details of repairing and removing some of the anchors in the wilderness area, but I don't know that I can support that all the way. I recognize that the Wilderness area is seem as an appropriate area for visitors to climb in but I think repairing or even removing the anchors in that area go against the Wilderness Act. I feel like there may be some loopholes you can work through to have theses repair happen in the area, but I still think it counteracts some of the main characteristics of Wilderness. Other than that I enjoyed and support the rest of your plans for the area. I think more education and work with the public regarding the titles on the last page and really important for parks and I was happy to see things like that apart of the plan. I am interested in seeing how this project will turn out and look forward to reading more.”
- The American Alpine Club – “The ACC agrees with DO#41, Section 7.2, stating that climbing is a legitimate, appropriate, and historical use of Wilderness. The Wilderness climbing experience is unique, as it provides opportunities for solitude, primitive, and unconfined recreation. Climbing and the use of fixed anchors is a legitimate, appropriate, and historical use of Wilderness that is compatible with the Wilderness Act.”
- The American Alpine Club – “The AAC supports the JTNP's efforts to protect and promote appropriate use of Wilderness. The AAC supports efforts by the JTNP to thoughtfully balance the needs of the public to access and enjoy primitive and unconfined recreation with the protection of Wilderness characteristics and other natural resources found within the JTNP.
- “In partnership with the Access Fund, The Wilderness Society, National Parks Conservation Association, and the American Mountain Guide Association, the AAC shared comments and support for the development of DO#41, as well as Resource Manual #41 during thier creation. The AAC supports appropriate regulations and restrictions on fixed anchors in Wilderness, including the principle that fixed anchors should be “in Wilderness. Furthermore, the AAC supports the JTNP's authority to manage fixed anchor placement in the Wilderness, including the prohibition of bolt-intensive climbs that exhibit high levels of use and measurable impacts to the JTNP resources and social conditions.”
- “The AAC 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. NPS can do more to protect Wilderness character by focusing its limited resources on these management issues rather than reviewing every existing fixed anchor within wilderness.”

## COMMERCIAL USE / GUIDING

**Concern Statement:** Commenters urged the park to continue to allow commercial guiding in the park wilderness:

- The park should continue to allow commercial guiding operations in wilderness because the majority of visitors who want to climb in wilderness lack the technical knowledge and capability to do it safely.
- The park should continue to allow commercial guiding operations in wilderness because guides supplement NPS staff in teaching visitors about identifying and avoiding impacts on sensitive natural and cultural resources and leave no trace principles.

- It is necessary to the administration of wilderness values for the purposes of the Wilderness Act (recreation and historical use) for the NPS to allow commercial guide services or institutions to continue to operate in wilderness areas of the park. In a park that is over 80% designated wilderness, prohibiting qualified guides would limit the ability of the general public to enjoy safe access to the vast majority of the park.
- The park should, "take a forward-looking and proactive approach to commercial climbing management, Joshua Tree National Park should make a determination of extent necessary for commercial climbing that recognizes the significant need for guides in Joshua Tree Wilderness to fulfill the public purposes of the Wilderness Act, and accounts for the increased interest in wilderness climbing that is occurring now, and into the future."

### **Representative Quotes:**

- Cliffhanger Guides – "Commercial Guiding and Instruction is a critical way for visitors to safely access the Wilderness in Joshua Tree for the purpose of recreation. However, the default setting in the Wilderness Act is that Commercial Services are prohibited. Major lawsuits have been fought in a number of places over this issue and some places have been shut down to all commercial guiding such as Zion National Park which has severely curtailed the ability of the general public to access wilderness for recreational purposes because they lack the skills to do so safely and responsibly. Other areas have gone through the minimum requirement analysis process and found commercial guiding to be necessary to support the access of the public for recreational use of wilderness as well as historic use."
- "The vast majority of the public does not have the technical skills, knowledge, and understanding of technical rock climbing, scrambling, route finding and navigation to be able to access the outstanding opportunities for solitude or primitive or unconfined recreation that is the heart of the wilderness act that can only be attained in a technical environment by a skilled practitioner. It is necessary to the administration of wilderness values for the purposes of the Wilderness act (recreation and historical use) to allow commercial guide services or institutions to continue to operate in wilderness areas. In a park that is over 80% designated wilderness, prohibiting qualified guides limits the ability of the general public to enjoy safe access to the vast majority of the park."
- "Furthermore, professional guides provide one of the few opportunities the park has for direct contact to park visitors and we are vital to teaching responsible recreation practices, helping visitors identify sensitive resources such as cryptobiotic soil or cultural heritage sites, urging them to walk only on durable surfaces and be careful not to trample vegetation, teaching them Leave No Trace principles, and providing an invaluable opportunity to pass on stewardship and responsible wilderness behavior. The park does not have the capacity to reach most of its visitors directly so we create a link for educating the public on proper wilderness behavior and visitation. With the exponential increase in visitorship over the past decade, uneducated visitors lead to resource damage and the necessity to move people quickly through the kiosk limits the opportunities the park service has for outreach and education. Guides fill a vital role in educating the public and being ambassadors for the park. Beyond that, many of the wilderness areas of the park provide extremely difficult navigation, route finding, and safety challenges. Much of the public does not have the skill set to even hike in areas such as the Wonderland of Rocks. We are necessary to the administration of the wilderness for its stated purpose of recreational access."
- "Twentynine Palms local climber in support of an education exemption to section 4(c) to permit limited guiding in wilderness areas. I would argue that there are many climbing and hiking guides operating in the park who are able to provide an incredible amount of knowledge on their guests (natural and human history), and many who take great pride in stoking the fire of stewardship in folks who otherwise may not have access to that concept. It's also true that there are probably more

guides that interpret rangers operating in JOTR on a given day, and that the guides are therefore having a greater per capita impact daily. Guides can do an impressive job talking about soil crusts, endangered species, cultural sites, etc.

However, what if guides were able to do an even better job? Make it a requirement for guides to attend a training once a year with park staff - could be a wildlife or biological or physical science technician, could be an interpretive ranger, could be the superintendent, to give the guides better tools to educate with. More up to date information (e.g. many guides still think *Y. brevifolia* is in the Lily family), the latest science on climate change or tortoise numbers, cultural history, better and more effective interpretive and educational techniques, etc. Have a ranger do this work once a month, and guides must attend at least once every 12 months to get their guide card, and help the guides be even better at providing education to the public.

A CMP having requirements of their CUA holders is not out of line. Devils Tower NM requires CUA holders to acknowledge the voluntary June climbing closure on their websites, whether or not that guide service chooses to respect that closure. JOTR requires CUA holders to have WFR certifications and guide certifications - why not also educational standards for them?"

- American Mountain Guides Association – “In consideration of the large amount of wilderness climbing in Joshua Tree and the many ways in which climbing guides fulfill the purposes of the Wilderness Act, it is clear that commercial climbing guides are exceedingly necessary and appropriate in Joshua Tree Wilderness. The extent to which they are necessary should--at a minimum--be equal to existing levels of commercial climbing in Joshua Tree Wilderness. However, public interest in climbing is growing and demand for professional guides is on the rise. Climbing has recently been recognized as an Olympic sport, public schools nationwide are installing artificial climbing structures, and indoor climbing gyms provide an avenue for new climbers to quickly learn the basics. With this heightened interest in climbing, there are more entry level climbers every year seeking to experience wilderness climbing in Joshua Tree with a guide. A sufficient amount of commercial climbing services should be available in the years ahead to help these new visitors realize the recreational, educational, and scenic purposes of wilderness, and to have the opportunity to learn wilderness climbing skills under the tutelage of a trained professional. Furthermore, guides will help ensure these visitors are recreating responsibly in Joshua Tree Wilderness by following Leave No Trace practices such as staying on established trails and durable surfaces, avoiding cultural resources and sacred sites, and minimizing impacts on other visitors. For all of these reasons, and to take a forward-looking and proactive approach to commercial climbing management, Joshua Tree National Park should make a determination of extent necessary for commercial climbing that recognizes the significant need for guides in Joshua Tree Wilderness to fulfill the public purposes of the Wilderness Act, and accounts for the increased interest in wilderness climbing that is occurring now, and into the future.”

**Concern Statement:** Commenters provided suggestions regarding commercial guiding in the park wilderness:

- The park should limit group size on weekends and holidays and specify specific dates for holiday restrictions, rather than limit guiding.
- The park should include in the plan a requirement that commercial use authorization holders attend educational programs with NPS staff.
- The park allowing easier access to the most pristine areas in wilderness, via commercial guiding services, is not in the best interest of the environment.
- Based on map review, it appeared that most guiding revenue likely comes from nonwilderness lands in the park.



## CLIMBING STYLE MATRIX

**Concern Statement:** Commenters provided feedback on the climbing style matrix:

- The climbing community should have input into defining climbs and assigning definitions to specific routes.
- Sport climbs should be defined as climbs established by drilling bolts for protection while on rappel. A traditional climb would be a climb where the protection was established from the ground up, whether these are bolts or other natural or traditional anchoring pieces.
- Routes that are primarily protected by bolts but were established ground up should still be considered a traditional route. Routes established ground up typically have fewer bolts and only as many bolts as are required to keep the route reasonably safe.
- The definitions of sport climbs and traditionally bolted routes are highly subjective.
- The park should use the three widely understood terms in common usage. One is “sport” climbing, the term for when protective gear is permanently and abundantly fixed on routes. The second is “traditional” climbing where climbers place only removable protection as they climb. The third common term is “free” climbing, which means using little to no protection; whereas the term “pure” as proposed in the draft matrix is not in common usage.
- To implement Director’s Order 41, the park should make the subjective call if the route is bolt intensive, and the park must then assess the route’s use or potential use and evaluate that uses impact on wilderness characteristics and other resources to decide whether to approve the route and associated fixed anchors.
- The impact is not from the type of climb but from the volume of use.

### Representative Quote(s):

- “I would like to suggest the original definition of a sport climb: “a climb established by drilling bolts for protection while on rappel.” A traditional climb would be a climb where the protection was established from the ground up, whether these are bolts or other natural or traditional anchoring pieces. Routes that are primarily protected by bolts but were established ground up should still be considered a traditional route. Routes established ground up typically have fewer bolts and only as many bolts as are required to keep the route reasonably safe.”
- “The delineation between sport climbs and traditionally bolted routes in the outlined plan is highly subjective, and leave ample room for increasingly restrictive interpretation.”
- Access Fund – “To implement DO41, the NPS should make the admittedly subjective call that the route is “bolt intensive,” and the NPS must then assess the route's use or potential use and evaluate that use's impact on wilderness characteristics and other resources to decide whether to approve the route and it associated fixed anchors. We acknowledge that DO41 establishes a policy presumption that “intensive” routes are inappropriate in wilderness, but the focus of land managers should not be on establishing criteria or an analytical process to assess whether a route is “intensive.” Again, the focus must rather be on existing or anticipated use and the impacts of that use.”
- “In fact, JTNP presents a probabilistic model for climbing route destination choice in its CMP story map that can be used for this purpose, although as we explain further below we think a better probabilistic model is available. The description in the story map narrative states that the predictive model is “on four characteristics: 1) accessibility (distance to parking), 2) route difficulty, 3) popularity (star) rating, and 4) climbing style.” Climbing style refers to the type of climbing protection on the route. This is similar to what is described in the proposed “ of Leadable Climbs” matrix, but

ostensibly is designed to be merely one of several predictive factors to assess use level rather than an additional independent analytical protocol based on factors that have nothing to do with resource impact. Below is a graphic, called “Map of climbing activity,” the NPS has provided demonstrating the use of this model.”

- Access Fund – “As this graphic demonstrates, the model can be used to show and to predict the general flow pattern of climbers. Such a model can be used to help assess potential resource impacts, and ultimately to identify whether management action (such as denial of an application for new fixed anchors) is necessary to protect wilderness characteristics and other resources. As such, the “of Leadable Climbs” matrix is superfluous.”
- “This graphic also demonstrates that fixed anchor intensity is not a critical driver of climber use, consistent with the direction in DO41 to focus on use levels and impacts rather than simply fixed anchor frequency.”
- “This question is thoroughly examined in the JTNP report and associated 2010 dissertation titled “on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California.” The research clearly indicates that some bolt-intensive climbs attract high levels of use (and potential impacts to wilderness characteristics) and others attract low-levels of use (and no measurable impacts). The reasons for the difference are rooted in the destination choice model that applies the well-substantiated significant factors that determine how a climber chooses a destination - distance from trailhead, quality of route, and difficulty of route.”
- “We think a more useful probabilistic model than that shown in the story map (based on the research just cited) is displayed below, which is in alignment with DO41 and based on the same variables and empirical evidence. This model displays the zones of high-use (climbers choose those destinations more frequently) alongside the density of fixed anchors in the wilderness. This model is extremely useful for understanding where incompatible, bolt-intensive climbing routes might be located due to the “ of human activity which they support, and the types and levels of impacts associated with such routes.” current understanding of climber flow patterns in JTNP Wilderness, combined with a near-comprehensive inventory of climbing routes, allows JTNP planners to consider well-informed, and less burdensome, management models for mitigating the impacts of inappropriate, bolt-intensive climbing. To comply with the Wilderness Act, JTNP should determine zones that correspond to use-levels in order to focus management efforts on high-use (and high impact) areas where bolt-intensive climbs are associated with measurable impacts to wilderness characteristics.”
- Access Fund – “The Proposed Matrix “of Leadable Climbs” is flawed. JTNP proposes to identify “routes as referenced in DO41 by using an analytical matrix entitled “of Leadable Climbs.” As we understand it, this would be applied to every single route with one or more fixed anchors within Park wilderness. Using the matrix, any route classified as “would be deemed inappropriate in Wilderness and not approved or, if existing, removed. Any route classified as “Bolted” or “(both of which may have fixed anchors, according to the matrix), may also not be approved, or if existing, removed, if further MRA assessments showed unacceptable impact to wilderness character or other resources. This matrix is fundamentally flawed and would jeopardize climber safety.”
- “JTNP's attempt to define “intensive” is problematic for several reasons. The matrix provides two “characteristics” to distinguish “and “Bolted” routes, namely (i) the degree to which removable protection can be used to supplement existing bolts and (ii) bolt spacing. The matrix couches both these factors largely in terms of climber safety, not visual impact--or other impacts to wilderness character--which might bear on whether a route is compatible with wilderness. JTNP fails to explain how removable protection and bolt spacing may affect wilderness character. The Wilderness Act's

touchstone regarding recreation is whether the activity is primitive and unconfined, not whether it risks injury or death. Climbing enabled by fixed anchors is primitive and unconfined recreation, and whether a route is safer than another route because of the opportunity to place removable protection or the frequency of fixed anchors is irrelevant to effectuating Congress' intent to provide primitive and unconfined recreation.”

- The matrix is misguided because DO41 requires the NPS to focus on the activity that would occur or is occurring on a bolt-intensive route and the impacts of that activity on wilderness character. Again, Section 7.2 is clear that “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.” (Italics added). Therefore, whether a bolt-intensive route is inappropriate in wilderness does not depend on the existence of the bolts themselves, but on the route's use level and resulting impacts. The proposed matrix has nothing to do with evaluating use level and potential impacts. Instead, it provides “characteristics” to categorize routes based solely on a route's opportunities for protection and climber experience related to safety. Nothing in DO41 or any other NPS guidance of which we are aware supports the use of such an analysis.
- Furthermore, to the extent that that CLIMBING STYLES MATRIX is intended to be used for planning or permitting purposes, it must be re-evaluated, with significant opportunity for public comment and input. While difficult, climbing styles and evaluation of appropriate use should not come down to bolt counting or bright line rules”.
- “Traditional climbing is starting from the ground and climbing up. Sport climbing is starting from the top, rappelling and placing bolts, and then climbing from the ground up, after the bolts are in place. A traditional route can be fully bolted, and can even be quite safe- -although they are usually more exciting and committing than a climb which was bolted on rappel.
- BUT, establishing climbs on rappel is often a good strategy, and does not mean the climb can't be exciting and adventurous. Often people resort to bolting on rappel (rather than on lead) because the climbing is just so difficult and the stances are so marginal that it is difficult to place on lead. Maybe you would need to hang off of a metal hook to place the bolt on lead- -and that can lead to damage to the rock that could be avoided by bolting the climb on rappel. All of the bolts could be placed in the same places, but on rappel, allowing for the exact same climbing adventure and also protecting the rock from potential damage from metal hooks, botched bolt holes, or other things that can happen when bolting a climb on lead.
- Appreciating these subtleties and allowing for the wide range of climbing styles and ethics in Joshua Tree is part of what gives in such a rich history. Joshua Tree has climbs in every style with colorful, celebrated, and sometimes controversial histories. Climbs were established as top ropes, climbs were established on sight-freesolo, climbs were established with aid, climbs were established bolting ground up freeclimbing, climbs were established bolting on rappel. And the history and stories of how it all unfolded in the park is valuable and unique. With world renown climbers like John Bachar freesoloing hard climbs and adhering to strict traditional ethics, and strong younger (now older) climbers like Scott Cossgrove establishing cutting-edge sport climbs on some of the steepest features in the park, while still practicing ground-up ethics in an incredibly bold style!
- Over the years the climbing community has tended towards allowing sport climbing tactics more and more. And this allows for people with more diverse backgrounds and interests and skill levels to participate in the sport and enjoy the wonderful adventures of climbing. Not everyone loves being terrified, with every muscle in their body shaking and nothing in sight to hold onto as their fingers become sweatier and sweatier and their shoes begin to slowly ooze off of the small granite dimples- -the last bolt too far below them to even arrest their fall before cratering 30 feet into the jagged

talus. I personally enjoy those types of mental challenges. I love climbing without a rope, I love skipping bolts, I love the meditation and focus I find in that state and climbing lets me have that experience. But I also want other people who aren't as bold to be able to experience adventures out in the wilderness without getting too scared (climbing on lead is always a little scary and adventurous to begin with! Have you tried it?) I want those wonderful hard climbs in the wilderness that couldn't be established ground up for one reason or another to be preserved as a beautiful challenge and adventure for anyone strong enough and stoked enough to be willing to try them."

- "I support Joshua Tree's matrix and categories for defining styles of climbing routes. The emphasis should be on "Bolt intensive routes are incompatible with Wilderness" NOT that bolts/anchors are permanent installations and thus, prohibited."
- "I appreciate the nuanced way of looking at "bolted" climbs vs. sport bolted, to account for Joshua Tree's unique style. I think what people are concerned about is that using the language "are prohibited" is NEW language, and that could be applied in other wilderness areas in ways we don't expect. So I would advocate against using that language."
- Sierra Club – "Regarding the proposed categorization of climbs: one has to question the use of the term "trad[itional] bolted" for climbs. This is applied, for example, to the "Mamunia" route, yet this route has fixed anchors every nine feet on average, and is rated a sport climb by Mountain Project. While favored by climbing advocates, the term "trad bolted" is generally used as a euphemism to try to legitimize what are really sport climbing routes. Instead of confusing and controversial terms, the Park should use the three widely understood terms in common usage. One is "sport" climbing, the term for the comparatively recent activity in which protective gear is permanently and abundantly fixed on routes. The second is "traditional" climbing (formerly called clean climbing) where climbers place only removable protection as they climb. So, in light of accepted terminology, the moniker "trad bolted" is a confusing contradiction in terms. The third common term is "free" climbing, which means using little to no protection; whereas the term "pure" as proposed in the draft matrix is not in common usage. Once climbing routes are properly categorized using commonly known terms and definitions, the Park should delineate which climbing practice may or may not be appropriate in the Park, and in which location(s). In sum, while the monzonite granite formations of JTNP may be uniquely suited for opportunities for rock climbing, NPS guidance requires that the activities in park units "foster an understanding of, and appreciation for, park resources and values." The fact that there are 20,000 mostly unauthorized fixed anchors in JTNP, with several thousand in its pristine Wilderness areas, demonstrates that rock climbing activity here has failed to foster respect for Park resources, much less Wilderness values."

## **SAFETY**

**Concern Statement:** Several commenters suggested that NPS proposing removal of permanent fixed anchors in wilderness poses legal liability and risk for the park:

- The park prohibiting or impeding bolting is a huge safety risk.
- The park should not be involved in considering what types of bolts are safe and who should be doing the bolting.
- The park's proposed policy presents serious liability for the National Park Service.
- The park needs to rethink the traditional bolted routes concept, where bolts were placed far apart, as this style does not meet industry standards.

## Representative Quotes:

- “Legally, you need to rethink the traditional bolted routes concept where bolts were placed far apart. This leads to not meeting industry standards. The safety rope is a big part of the safety standards. The UIAA standard for standard ropes is a 16-foot fall, that means the fall is 8 feet above the bolt and falls 8 feet below the bolt. So, bolts should not be placed any farther than 8 feet apart.”
- “I know you cannot fix all traditional bolted routes, but when they do get re-bolted you legally have to bring them up to the latest standard. Just like you would not replace an old ¼ " Raul bolt with a new ¼ " Raul bolt. Because the new standard is 3/8 or more. The traditional bolted routes have to be brought up to the latest standard.”
- “I am confident the park will make sure all new bolts will be of the highest quality and meet latest industry bolt standards. But what about installation?”
- “Are the people bolting new routes or re-bolting qualified to do so? Are they certified? Just like the park makes sure guides are certified. It is apparent that to minimize the park's liability to make sure people putting in bolts that will last 100 years know what they are doing. I would suggest as part of the plan, to develop a minimum certification standard for bolt placement certification.”
- “I know there are more things that need to be considered to help the park and the government to minimize their liability.”
- The bottom line is, if I was a lawyer for a plaintiff that slipped on the floor in the bathroom and wanted to show the entire park's negligence, I would be looking at this climbing management plan to see how many things are not getting done.
- “It does not matter what the climbing community wants or what the climbing culture wants, if it creates a legal liability that could bring a worst-case scenario of the court shutting the entire park down to climbing because of unsafe bolts, negligence or lack of bolt management.”
- “JTNP's new proposed climbing management plan that would prohibit or impede bolting is a huge safety risk.”
- “I really urge you to rethink and restructure this initiative. I think we all wish to keep our outdoors clean and relatively minimally disturbed. However I feel this initiative as it stands would just lead to use of decayed and defective protection systems for climbers ultimately making climbing unsafe, and an injury liability in the park. Let's work together to establish a better best practice for anchors and upkeep.”
- “On the other hand, removing or prohibiting the maintenance of fixed protection on existing routes amounts to setting death traps for climbers. Will warning signs be posted about missing and aging protection? If not, the proposed policy presents a serious liability for the Park Service. If so, the warning signs will be far more impactful environmentally (and aesthetically!) than fixed protection on climbing routes.”
- “From the Land Managers perspective, arguments about "safe bolts" are fundamentally flawed. It is simply not the business of land managers to engage in considerations as to what types of bolts are safe and who should be doing the bolting. Risk management considerations would have the land manager step aside from those arguments.”

**Concern Statement:** Commenters suggested that removal of fixed anchors in wilderness presents a safety issue to climbers:

- Climbers cannot trust the integrity of fixed anchors when they don't know their age or the expertise of the installer.
- Climber safety would be compromised if the maintenance of aging fixed anchors were prohibited.

- Poorly constructed removable anchors and deteriorated fixed anchors have and will continue to result in climber deaths.
- More accidents and injuries, necessitating the use of EMTs, paramedics, helicopters, may result from removal of fixed anchors.

### **Representative Quotes:**

- Yuba County Office of Education – “If fixed climbing anchors are found already in place by future climbers, how are they supposed to trust the integrity of these anchors when they don't know how long they have been there and if the person who placed them knew what they were doing.”
- “Fixed anchors are the safest for climbers and have the least impact on the environment.”
- “I would like to visit the park again in the near future and I'm worried that the new strategy will result in routes becoming unsafe to descend. An essential component of our trip was the fixed anchors we used to rappel off of the routes.”
- “Please reconsider the decision to remove bolt intensive climbing routes in Joshua Tree National Park. Doing so would reduce the margin of safety needed to successfully climb most routes.”
- “Within Joshua tree, it would jeopardize climber safety by prohibiting the maintenance of aging fixed anchors.”
- “These bolts and anchors do need maintenance, however, and prohibiting replacement and maintenance of bolts and anchors will result in DEATH. Please keep climbing safe and fun. Also I've never noticed bolts on a rock before I started climbing so I simply don't understand why you would ban bolting of rock.”
- “Fixed anchors and bolts are safety measures, and I am concerned this new approach will create unsafe situations requiring additional national park resources (such as SAR). If climbers are requesting to replace existing bolts, and then that route would be denied re-bolting and “this creates a situation where climbers may not reach out to get rebolting permits, even if the route desperately needs it.”
- “Disallowing the placement of fixed anchors and their maintenance opens up climbers to increased risk, or simply turns climbers away from the park to visit locations more friendly to sport climbing.”
- “Suspension of maintaining bolts in wilderness areas will lead to injury or death of climbers. At times there is no other option other than using the bolted anchors at the top of routes. While they will be safe or years or decades, eventually all anchors will need replacing otherwise at some point someone will die when rappelling off an anchor that should have been mindfully replaced, but was not because of the restrictions suggested in the JTNP climbing management plan.”
- “Without these anchors climbing in Joshua Tree becomes inherently more dangerous with sparse gear placements. More dangerous climbing results in more climbing accidents and injuries. I'm concerned this could have a snowball effect in the sense that if EMTs, paramedics, helicopters, etc. are trying to access injured individuals there will be more erosion and destruction to the already fragile landscape. It will also take these healthcare workers out of normal daily calls in the surrounding towns, which means local citizens with strokes, heart attacks, falls, etc. will also experience detrimental effects due to impending lack of resources. Without prompt emergency response locals will have more poor outcomes and certainly some fatal outcomes. Healthcare is already understaffed and burnt out with the pandemic I think this would put an additional unnecessary strain on a system that is suffering.”
- “I'd like to communicate my deep concerns for the plan to let fixed anchors age out and/or not be replaced. I saw first hand, while working as a healthcare provider at Desert Regional Medical Center,

that people have and will die from poorly constructed removable anchors and that people have and will die from deteriorated fixed hardware.”

## **FIXED ANCHORS IN WILDERNESS: SHOULD BE ALLOWED**

**Concern Statement:** Commenters noted that NPS policy, practice, and federal law, such as NPS Director's Order 41 and the 2019 Dingell Act, support climbing in designated wilderness areas, including the placement, use, and maintenance of fixed anchors.

### **Representative Quotes:**

- “NPS policy, practice, and federal law--such as NPS Director's Order #41 and the 2019 Dingell Act--overwhelmingly support climbing in designated Wilderness areas, including the placement, use, and maintenance of fixed anchors.”
- “Joshua Tree National Park (JTNP) recently proposed a climbing management strategy asserting that bolts and other fixed anchors are fundamentally prohibited in Wilderness areas. Bolts and other types of fixed anchors are critically important tools for climbing, including in Wilderness areas. JTNP's misguided attempt to fix a policy that was never broken in the first place is taking away the very thing that Wilderness areas are meant to provide to the American public--solitude and unconfined recreation.”
- “When Howard Zahniser and congress developed the wilderness act decades ago climbing and mountaineering were inherently at the core of the wilderness experience. That precedent has been upheld for decades and created enormous opportunities for seeking solitude in wilderness areas through climbing. This new plan looks as fixed anchors as an installation which is contrary to the precedent of climbing in wilderness that has been shown time and time again in places like Idaho's Sawtooth Wilderness.”

**Concern Statement:** Commenters stated that fixed anchors in wilderness have limited impacts:

- The NPS should allow fixed anchors in wilderness because the park is not overly bolted.
- The NPS should allow fixed anchors in wilderness because bolts consolidate the impact.
- The NPS should allow fixed anchors in wilderness because they keep people away from sensitive resources.
- The NPS should allow fixed anchors in wilderness because new routes prevent overclimbing in one area.

### **Representative Quotes:**

- “Properly installed fixed anchors are hard to find even if your looking. Without fixed anchors people will use slings and cord which is highly visible, can't be removed after rappelling from the route and will remain behind until they deteriorate from exposure to the weather. Responsible climbers will remove the old slings but must still leave new slings behind to exit the route.”
- “The bolts don't purpose any harm and a lot of people come to the park to enjoy climbing the rocks and clipping those bolts for protection. If routes are banned or removed then all your doing is removing history and enjoyment for park visitors along with a fun experience for future generations.”
- “As an avid climber and therefore user of the fixed gear at Joshua Tree National Park I see no reason for the existing bolting policy at Joshua Tree to be changed. Joshua Tree is already an area that is scarcely bolted compared to other climbing areas, and the existing rules on placing fixed anchors encourage climbers to use bolts thoughtfully and sparingly.”

- “Bolts and permanent anchors reduce impact on surrounding rock and vegetation by creating a safe anchor that concentrates all human impact in one spot. It is like having a paved parking lot where cars can park and their impact is minimized on the surrounding environment. Yes there is impact from the parking lot acutely at the location, but it reduces the damage of people parking wherever they can. Climbers want to minimize the human impact on the natural environment. Permanent bolts are a tool to reduce this impact.”
- “I have been climbing here in Joshua Tree National Park for years, one of the reasons I love climbing here so much is the conservative bolting philosophy. There are next to no routes here that an experienced climber would call overly bolted to the point that you could remove any and it would still be safe to climb. I agree that walls getting grid-bolted in Joshua Tree is not acceptable, but there is not a wall like that in the park now, nor will there ever be, because we, as a community of climbers, understand the consequences if that does happen”
- “...establishing new routes is beneficial; new routes minimize the damage to areas that are already exposed to excessive use...”
- “Bolts and climbing anchors are a very inconspicuous item; I doubt if non climbers even notice them. Trails and leantos are much more conspicuous. In many cases bolts are needed on a climb because there is no natural protection to use. We have been using bolts in the Wilderness areas of the Adirondacks for years with no problems. I am asking you to please not prohibit them.”
- “This applies to both front and back-country bolting. Bolts contribute to the ongoing preservation of the wilderness in several ways. Bolted routes consolidate user impact, similar to keeping hikers on a path. Up-keeping and repairing bolted routes will allow users to focus on the best routes. Very often, the “routes are the ones with many bolts. It is essential that these bolt protected routes are preserved because quite simply, they are the ones that people like to climb. Preserving them will allow users to centralize their impact, rather than seeking out yet another new route.”
- “As a member of the local community, I think it is critical that the NPS continue to allow bolting in wilderness as per the current guidelines, which have not resulted in overuse of wilderness areas. Wilderness areas and climbing areas in the wilderness are arguably far less crowded than some hiking areas, like Rattlesnake Canyon and the Boy Scout Trail.”
- “American Mountain Guides Association - Fixed anchors are necessary tools for guided climbing in wilderness because they enable travel over technical climbing terrain; mitigate natural, cultural, and social impacts; and support climber safety as a component of the climbing safety system. Wilderness climbing can include travel into locations where removable anchor placements are not available. In these situations, fixed anchors are necessary to allow for the ascent or descent of technical terrain when no other means of anchoring exists. Fixed anchors are also used to direct climbers away from sensitive natural and cultural resources and disperse climbing parties across the climbing landscape to protect solitude. Also of critical importance, fixed anchors are a component of a climber's safety system, allowing a person in high-risk and remote terrain to utilize a rope to prevent a fall that could otherwise be fatal.”
- “While there are fewer (bolted) Sport climbs at Joshua tree than other types of climbing routes, those which are there are ultra-classic and well known amongst California climbers and beyond. The bolts themselves are barely visible; on a recent climbing trip it took me 5 minutes staring at the cliff before I found the bolted route I was looking for. Bolts are by no means harmful toward the natural state of Joshua tree. Joshua tree holds a dear place in my heart as I've spent a lot of great time there climbing and backpacking the CHRT (trail that traverses the entire park). I've settled to realize that Joshua tree is by far a more worthy place to recreate as a climber than as a tourist or backpacker; other national parks are more naturally beautiful, but few replace Jtree's quality of climbing, and for



this reason its most passionate visitors are almost all climbers. The climbing community is a very nature-sensitive one and they are always sure to bolt and tread responsibly on any Jtree granite”

- Larkspur Landscapes – “Joshua Tree is not considered a “intensive” climbing location by any standard. Historically, bolted slab and sport climbs are primarily bolted in a conservative manner in Joshua Tree. The improvement/replacement of existing climbs and their fixed installation safety points should not be tampered with outside the hands of those skilled to remove and replace bolts. Removal of noted “would assert a dangerous precedent for the future of climbing safety and the right to recreate generally within our public national parks. JTNP should be required to enter a “faith agreement” to not remove existing fixed anchors and rather assess the condition and replace if necessary.”

## **FIXED ANCHORS IN WILDERNESS: SHOULD BE PROHIBITED**

**Concern Statement:** The NPS should prohibit the installation of all new fixed anchors in the wilderness areas of the park:

- Fixed anchors are prohibited by the Wilderness Act.
- Only removable anchors should be used in wilderness.
- Fixed anchors impact the rock face.
- Fixed anchors prevent viewing an unspoiled natural landscape.
- Climbers should climb with their own gear.
- The park's landscape is very fragile.

### **Representative Quotes:**

- “The NPS should prohibit the installation of all new fixed anchors in the wilderness portions of Joshua Tree National Park...”
- “Only removable anchors should be used for climbing in Wilderness.”
- “Kudos to the NPS for recognizing that permanent fixed anchors are prohibited by the Wilderness Act.”
- “fixed, human installed, climbing aides - such as bolts - are a contradiction to the idea of wilderness! They should be forbidden in areas which have been declared to be wilderness.”
- “People visit places like Joshua Tree Park to commune with unspoiled natural landscapes, not to be reminded of how badly the rest of America is overpopulated and developed. That can't happen when they see boulders and other rocks defaced from the use of anchors or permanent anchors or mounts for same installed there. If climbers can't scale a rock with anchors then they should choose a smaller rock, rather than using hardware that defaces rocks and reminds us why we're drawn to places like Joshua Tree Park in the first place.”
- “Our natural wonders are being defaced constantly and it is time to enact laws to protect these natural wonders. Removable anchors should be only used in wilderness areas. If a climber can't climb without permanent anchors then they should be denied the right to deface our national monuments.”
- “The landscape of the Joshua Tree Wilderness area is breath taking but fragile. To preserve it for future generation we must be vigilant. There is no reason why the beauty and integrity of the rock faces should be defaced.by the use of permanent fixed anchors.”

- “Joshua Tree is not Disney land. If young climbers don't learn to use their own gear, what will happen when they get to a place somewhere in the world that doesn't have fixed anchors? Installation of fixed anchors not only is destructive, it steals the opportunity for young women and men to learn an important skill. Using one's brains to problem solve helps in life's challenges. Our children learned at a very young age. Sometimes they were scared, but by making informed decisions, they overcame obstacles. Now that is the way they approach life. They are both contributing adults in society, show confidence and skill at work and at home where they've raised another generation of strong confident kids. Do not take this opportunity away from generations of young people.”
- “Only removable anchors should be used for climbing in Wilderness.”
- “Installing new fixed anchors will only undermine the rock formation and gradually this will erode the rock face because of cracking and splitting of the rock. Nothing is more important than saving the wilderness that we have - abusing it like this is NOT AN OPTION. PLEASE DO NOT ALLOW THIS TO HAPPEN.”

### **FIXED ANCHORS IN WILDERNESS: EXISTING ANCHORS SHOULD BE REMOVED**

**Concern Statement:** Commenters stated that existing anchors should be removed from wilderness in the park:

- The park should remove bolt intensive routes to comply with the Wilderness Act.
- The park should keep the wilderness resource as natural as possible by requiring everything brought in by humans be removed after use.
- The park should remove bolted routes that were installed without a permit.

#### **Representative Quotes:**

- “We need to keep this resource as natural as possible by requiring every thing brought in by humans be removed after use.”
- “I support the NPS determination that fixed climbing anchors are installations under the Wilderness Act. And they must be removed if any now exist in Joshua Tree.”
- “The NPS must act to remove any existing anchors in the wilderness portions of Joshua Tree National Park.”
- “Removing bolt-intensive routes in wilderness to comply with the Wilderness Act.”
- “Assessing existing fixed anchors for impacts to natural, cultural and wilderness resources (with an assumption that they may be removed if related to unacceptable impacts).”

### **FIXED ANCHORS IN WILDERNESS: EXISTING ROUTES SHOULD NOT BE REMOVED**

**Concern Statement:** The park should provide assurances that good faith efforts to replace existing bolts in wilderness areas will not result in managers removing routes:

- Many potential visitors will lose out on opportunities to connect with nature.
- Many of these climbs are historically significant in the climbing world.
- The removal of existing routes will result in significant safety hazards to climbers.
- Climbers would be required to make their own anchors using webbing which is unsightly.
- Bolts are a critical, low impact tool to help people enjoy the outdoors safely.

### Representative Quote(s):

- “Help keep Joshua Tree a safe place to climb by letting the replacement of bolts and maintaining the integrity of routes that are existing in the park.”
- “I believe that climbing can exist in national parks with proper management and that the existing bolts in the park have historical and current relevance. Carefully selected bolts and anchors are low-impact and provide a safe means to enjoy the rocks in the park.”
- “Please do not remove existing bolts as it will cause a significant safety hazard.”
- “Please respect that bolts are a critical, low impact tool to help people enjoy the outdoors safely. They are no more impactful than a trail. Please work with the climbing community to devise a plan that allows this historic climbing area to continue.”
- “In the event that bolts are removed, many, many potential recreators will lose out on a priceless opportunity to connect with nature while challenging themselves in life-improving ways. Being able to engage in rock climbing in the safest possible manner means even relatively newer climbers and families can have access to the sport, which becomes much more technical and expensive when clipping bolts are no longer an option. It is important to consider that removing bolts creates a pretty unfair barrier to access for those who can't afford the \$1000+ gear necessary for trad climbing. So those with the means and the expertise will find a way to keep climbing, but those without the means will lose out on amazing life opportunities.”
- “Climbing history and culture is deeply imbedded in JTNP and removing routes is akin to removal of other cultural history within the Park.”
- “My only concern is that the NPS will remove existing climbs that have a rich history in the park. I personally am OK with the continued outlawing of bolting in the park without a permit. However removing an existing climb is like removing art from a Museum. The route was someone's vision and hardwork and sweat. Yes it was most likely done without a permit. However it is Joshua Tree history. Joshua Tree is my favorite place to visit and to climb.”
- “Additionally, by removing fixed anchors climbers will then be required to make their own anchors which require a multitude of colorful webbing slung around rocks or attached to nuts, cams, etc... This would make the rocks appearance even more disturbed and not natural (which is the exact opposite of what we all want).”
- “as previously stated in former comments and meetings, the removal or refusal of permits to replace bolts on existing routes is problematic and could pose a danger to human safety as bolts are left to “age out.” Additionally, JTNP should provide assurances that good faith efforts to replace existing bolts in Wilderness areas will not result in managers removing routes mentioned in permit requests.”

### FIXED ANCHORS IN WILDERNESS: SHOULD BE MANAGED

**Concern Statement:** Commenters suggested that the park should manage fixed anchors in wilderness:

- The park should limit fixed anchors in wilderness.
- The park should evaluate the fixed anchors in the context of their surrounding wilderness characteristics.
- The park should consider a new policy that is based on a more nuanced and pragmatic interpretation of the Wilderness Act.
- The park should have a system for managing and updating bolts as they become old and unsafe.
- The park should review and approve new lead bolts and anchors on a case by case basis.

- The park could implement alternative rules to require new bolts to be colored/ camouflaged to match the rock.
- The park could include local climbing clubs / organizations in the permitting process.
- The park could consider cyclical seasonal closures of certain areas to climbing for restoration, to protect sensitive cultural sites and natural resources.

**Representative Quotes:**

- “I agree that existing bolts should be maintained, and new bolts should require permitting.”
- “Totally in favor of: -permit system for bolt replacement, including existing wilderness bolts (with the exception mentioned as part of the suggestion below)”
- “Some alternate options I think could be considered:
  - cyclical seasonal closures of certain areas to climbing for restoration
  - paid fees for climbing (not limited but paid) to increase dollars going to restoration efforts
  - pad placement limitations”
- “there needs to be a method of replacing existing bolts as they reach end of life.”
- “I am fine with a policy that limits the height or number of fixed anchors on a climb.”
- “The addition of new lead bolts and anchors should be reviewed and approved on a case by case basis.”
- “One suggestion I have for fixed anchors is to require that they be painted a specific color that's similar to the rock. This method is used extensively around areas in New Mexico, and even climbers have trouble seeing them from the ground.”
- “A more holistic and pragmatic interpretation of the role of fixed anchors in wilderness is needed, One that understand that the limited use of fixed anchors is essential for Americans to participate in tradition of wilderness climbing. This policy is too rigid and extreme, and seems to be based on a discredited form of wilderness purism. A new policy is needed, one that is based on a more nuanced and pragmatic interpretation of the Wilderness acts. A better policy would achieve a balance between permitting Americans to have genuine wilderness experiences by participating in the long tradition of wilderness climbing, while not allowing for the excessive and unjustified use of fixed anchors, which could undermine wilderness character.”
- “To preserve and protect heavily used formations and approaches to routes to avoid sensitive cultural sites and natural resources, different factors should be assessed. Some factors are pointed out in the NPS's Reference Manuel #41, these would be factors such as trail access, wildlife disturbance, vegetation damage and chalk use. Impact reports should be generated to measure these and depending on the results, ecological restoration should take place to help preserve sensitive areas.”
- “If shiny bolts are an eyesore, the park could implement alternative rules to require new bolts to be colored/camouflaged to match the rock.”
- “Having bolts be managed and updated as they become old and unsafe is both a benefit to the climbing community and the park in terms of reducing potential accidents in the park and providing a lower impact on rock with leaving anchor material around that lasts for many years of use.”
- “I love that we are looking to limit bolting, I do support this, as Joshua Tree has great natural protection. However, the community needs to have a say in who controls permitting, or climbing dosents. Climbing is a vital part to JTree's history, climber where here when JTree was just a

monument, they were here before Instagram made JTree famous. Climbers are the heart of this park and must be heard.”

- “While I do not necessarily agree with the permanence of the climbing infrastructure, I think it is important that the park management take action. In regard to future management actions as well as this one, I think it is of utmost importance to both receive public comments as well as the inputs from the native tribes that have lived in the area for millennia. Going forward it will be especially important to make co-management decisions on these issues with the tribes to take one step forward in righting the wrongs that the government has made towards natives in the past. Also, I urge park management to keep in mind the lasting environmental effects of any management decision going forward. With climate change drastically changing landscapes and ecological interactions, it will be important to safeguard areas of the environment wherever we possibly can.”
- “Therefore, I support climbing management policies where climbing is allowed to continue but within tight parameters. It should also be aware of the factors "of maxing out a resource" and "land designation" when giving input of climbing management plans. The proposed JTNP Climbing Management Plan is a solid conclusion to types of climbing and their relative support within the Park.”
- “I also support limiting the addition of new fixed anchors in wilderness - as a climber and also as a human being I find greater value in a landscape unmarred by little shiny bits of stainless steel over every dome. The Wonderland of Rocks, Queen Mountain, and Rattlesnake Canyon are some of the most spectacular landscapes I can ever hope to be in and I appreciate what the NPS does to protect those domes and canyons as they are. The deeper into the wilderness I go, the more disappointed I am to see bolts on a rock face. What's the point of them, I ask? Some routes aren't worth climbing, and many routes aren't worth bolting.

Regarding whether new fixed anchors should be allowed in front country settings, or in settings where 'wilderness' seems arbitrary (i.e. 200ft from the road {acknowledging as well that those lines do matter...In Tuolumne Meadows, wilderness begins about 50ft from the road in most cases}), could they be evaluated on a different basis? Is there some nuanced way to evaluate, essentially, the wilderness characteristics of a setting and whether or not those fixed anchors would damage that? Again, as a climber, I kind of hate seeing bolts in random places on probably crappy rock where I know few people will go (i.e. Lucky Boy Loop), and would rather that bolts deeper in the wilderness be limited. bolts 200 ft from the road, maybe.”

- “I understand and support the park's need to manage bolting in some way in JTNP. Clearly, we don't want the JT wilderness to look like New Jack City on a holiday weekend. The good news is, we're very far from that, and as long as the NPS doesn't suddenly "open the floodgates" and allow establishment of dozens or hundreds of new bolted routes, I can't imagine it ever happening. Wilderness areas are relatively untraveled by climbers and the impact is minimum. Based on my time climbing in JT, wilderness areas, including those with bolted climbs, seem to get less use and traffic from climbers than from hikers. For example, you would be unlikely to see many climbers on routes accessed by the Boy Scout Trail or in Rattlesnake Canyon even on a busy weekend, but you could expect to see many, many hikers. There are quite a few bolted routes in both of these areas, and yet they certainly don't get much use and their impact on the wilderness character is minimal and less than that of other user groups.”
- “Having said all that, I think it is critical that the NPS make it clear in the CMP that it supports bolting in some circumstances. The CMP should specifically state that the park considers bolting necessary in some cases “the administration of the area for the purpose of wilderness” (language from DO41). It is necessary because climbing is a legitimate and appropriate use of wilderness, and some bolts are needed to make it relatively safe and accessible for everyone to enjoy. The plan could make it clear

that the park supports bolting, just that new routes are subject to a minimum requirements analysis.”

- “I would also like to reiterate that the CMP should make it clear that the density of bolts on a route is only one consideration to determine whether a route is permissible and detrimental to the wilderness character of an area. Although DO #41 says bolts are generally incompatible with wilderness, that does not mean it is always the case especially when other impacts are low. The bolts (carefully managed and not overused) are critical for allowing the user group of climbers to enjoy our national parks' amazing wilderness areas.”
- “In regards to how “necessity” of rebolting is determined, I would strongly suggest that local climbing organizations be included in that determination. To allow a non-climber to evaluate the necessity of fixed anchor placements would be irresponsible and could result in serious safety issues.”
- “Regardless of how JTNP chooses to permit rebolting, I believe it is critically important that climbers have assurance that asking to rebolt a route will not result in closure of that route and removal of bolts. This would create a situation in which climbers either circumvent the system in order to keep routes safe and open, or follow the rules and allow routes to become unsafe if permission is denied.”
- “If JTNP chooses to deny climbers the right to rebolt routes, I believe you have an ethical imperative to take full responsibility for either maintaining those routes or removing all fixed anchors yourselves. To do otherwise would be to allow routes to “out” and become unsafe. This would be completely unethical and contrary to the relationship NPS has worked to build with climbers.”
- “In the event that the Park deems it necessary to establish stringent fixed anchor regulations to protect wilderness resources or character, I would like to see a very clear substantiation of why this action is necessary. Section 7.1 of NPS Reference Manual #41 states, “actions may include limiting use, temporarily or permanently closing all or a portion of a wilderness area to climbing or specific climbing practices, and/or establishing fixed anchor or fixed equipment regulations, when required to protect wilderness resources or character. If it is uncertain whether an activity will result in unacceptable impacts or not, the activity will be restricted or discontinued until the doubt is resolved” (p 2). This implies that permanent restrictive policies require a high degree of certainty about the unacceptable impacts posed by the activity.”

**Concern Statement:** Commenters suggested that the park should not change the way bolts in wilderness are currently managed:

- Existing, established bolted routes should continue to be allowed.
- The park should not adopt a new definition of fixed anchors, considering them "installations" that are presumptively incompatible with wilderness.
- Director’s Order 41 should continue to guide the park's management of bolts in wilderness.
- The proposed plan takes an unprecedented, prohibited-until-proven-legal approach to managing bolts in wilderness areas.
- Current NPS policy and management authority already provides sufficient guidance for managing climbing in wilderness areas.

#### **Representative Quotes:**

- “Joshua Tree National Park's new climbing management plan gets a lot right--trail management, cultural resource protection, and more--but it takes an unprecedented, prohibited-until-proven-legal approach to managing bolts in Wilderness areas.”

- “Please do not make such large changes to the Wilderness Act. Current NPS policy and management authority already provides sufficient guidance for managing climbing in Wilderness areas!”
- Access Fund – “The Regulation of Fixed Anchors in Wilderness - Federal agencies have and continue to regulate fixed anchors in wilderness throughout the country under the Wilderness Act and their governing organic acts. As discussed later, agencies have been successfully regulating fixed anchors in wilderness without taking the position that they are “under the Wilderness Act and therefore a “use.” This is entirely consistent with Congressional intent, both in enacting the Wilderness Act and in subsequent legislation designating wilderness areas on lands with climbing resources. There is nothing in the Wilderness Act or its legislative history to suggest an intent to prohibit fixed anchors in any way.

Instead, Congress called out primitive and unconfined recreation as a fundamental purpose and use of wilderness areas and included recreational values in the very definition of wilderness areas to be protected. JTNP's prior climbing management plans reflected this intent, as neither the 1993 Joshua Tree CMP nor the 2000 Joshua Tree Backcountry Management Plan specifically considered fixed anchors prohibited “that necessitate a Minimum Requirements Analysis for their use, for placement or replacement. We address these points in more detail below.”

- Access Fund – “Precedent - Stepping back to a nationwide view, the precedent JTNP will set by defining fixed anchors as prohibited “ is a serious one, with obvious implications for other agencies, parks, outfitters and guides. Such a precedent fundamentally changes the longstanding view that fixed anchors are inherently allowed with regulations implemented as needed, to the opposite regime where fixed anchors are inherently prohibited with exceptions implemented as needed. The potential for this shift to impact climbing access nationwide is profound, and a serious threat. The last time such an interpretation was taken (by an office of the Forest Service in 1998), it led to a nationwide ban on fixed anchors in Forest Service wilderness, which was overturned by Congress after it was strongly and successfully contested by numerous conservation and recreation organizations. JTNP's current proposal needlessly opens the door for new iterations of this incident to occur, especially in parks and other federal land management units that do not have as strong an understanding of the importance of fixed anchors in wilderness as JTNP, and which are far more likely to move toward overly restrictive and potentially illegal regulations on fixed anchors. The nuance that JTNP is operating within when it distinguishes between fixed anchors as being instead of is something that will likely be lost on other land managers, who may understand the term far more literally and be less amenable to using MRAs and having widespread administrative exceptions for fixed anchors in their wilderness areas, when they can simply ban them as a prohibited use.”
- “Existing, established routes should be presumptively deemed to be allowed. To the extent that the Park intends or consider removal of fixed anchors on an existing route, there should be an opportunity for public input.
  - Replacement of existing anchors should be presumptively allowed in any permitting process, particularly where hardware is being replaced item-for-item with modern hardware. The plan may consider whether camouflage or other techniques should be applied as may be specific to the route in question. Furthermore, the plan should recognize, prioritize, and streamline requests from established climbing organizations dedicated to this purpose, including the ASCA and Friends of Joshua Tree.”
- “The unauthorized removal of fixed hardware should be deemed a violation and classified under the most stringent civil and criminal penalties available. Rogue removal operations should not be allowed, and must be discouraged, particularly in view of the process that is required to add or update them.”

- “To reiterate: JTNP should not adopt a new definition of fixed anchors, rendering them “installations” that are presumptively incompatible with wilderness. Rather, the guidance in DO 41 should continue to guide the park's local rulemaking. I do support oversight and regulation of climbing in the park, and in particular within Wilderness areas to preserve the park’s resources and opportunities for enjoyment by all park visitors.”

## **FIXED ANCHORS IN WILDERNESS: EXISTING SHOULD BE MAINTAINED, NEW ANCHORS SHOULD BE PROHIBITED**

**Concern Statement:** Commenters suggested that the park should allow for the maintenance of existing fixed anchors in wilderness but prohibit the installation of new anchors:

- The climbing community will maintain the existing fixed anchors but the park can prohibit the installation of new ones.
- The park should allow existing pure sport routes in wilderness to stay but prohibit the installation of new routes.
- The park should grandfather in existing bolted routes that (a) were established before there was a climbing management plan, and (b) any that have been legally established under the current plan. Illegally established routes that have been put up since the adoption of the current plan should be removed.

### **Representative Quotes:**

- “If the National Park would like to create a moratorium on creating new routes in the back country that include bolts, I understand this sentiment. Our current situation is that the National Park has a substantial quantity of established routes in the back country, and these routes require maintenance as far as the bolts go. I would like to see the ability to get a permit to replace these established back country route anchors with the use of an electric drill upon approval from the permitting office. Electric drilled holes are better quality, take far less time to create (thus less interruption to the wildlife) and will ensure that people don't get injured from failing hardware in the worst possible environment (back country). The new standard for bolting in the park is 1/2” bolts, which is virtually impossible to drill with a hand drill.”
- “Climbers should use the already-placed anchors, or none.”
- “My prior suggestions included grand-fathering existing bolted routes that a) were established before there was a CMP, and b) any that have been legally established under the current CMP. Furthermore, I repeat that I have no problem with the Park removing illegally established routes that have been put up since the adoption of the current CMP.”
- “The climbing community will maintain these fixed anchors at the climbing community's expense. If the National park wants to prohibit new route development or be involved with the replacement process, I understand this.”
- “The amazement plan sound great as long as now new routes are put up in wilderness. I also believe that the pure sport routes in wilderness should be left and not removed.”
- “I think there should be a more nuanced view of bolts in the wilderness. While new bolting should be curtailed or prohibited, maintenance/replacement of old bolts and anchors should be allowed on a permitted basis. There are historical climbing routes that allow recreation in beautiful and secluded places (e.g. on Astrodomes, Lenticular, etc.). People will continue to climb these, but without the ability to replace old gear, the chances of injury, death, need for rescue, etc. will increase.”

## **FIXED ANCHORS IN WILDERNESS: LAW AND POLICY**



**Concern Statement:** Commenters expressed agreement with the National Park Service's determination that fixed climbing anchors are installations under the Wilderness Act:

- The park should prohibit the installation of all new fixed anchors in the wilderness portions of the park.
- The use of minimum requirements (MRA) analysis to determine whether a prohibited use is necessary is subjective, and the result is only as protective as the intentions of those entrusted to implement the Wilderness Act.
- The park's proposal to make needed material replacements for safety as well as removing rock climbing infrastructure is consistent with section 4c of the Wilderness Act.
- The plan should be consistent with the letter and spirit of the Wilderness Act, as well as the laws establishing the national parks.

**Representative Quote(s):**

- "I want to see a plan that is consistent with the letter and spirit of the Wilderness Act as well as the laws establishing the National Parks. This means that resource protection must be the paramount consideration in guiding the plan. Natural landscapes, fauna and flora, as well as geological features must be managed unimpaired for posterity to the fullest extent possible. This means less, not more, rock climbing in Joshua Tree National Park. In fact, I would like to see more restrictive permitting of this type of activity in Joshua Tree and other National Parks."
- "The NPS was absolutely correct in determining that fixed climbing anchors are installations under the Wilderness Act and should prohibit the installation of all new fixed anchors in the wilderness portions of Joshua Tree National Park."
- "Rock climbing in designated Wilderness is an allowable recreational activity, but many climbers rely on installing bolts or other permanent fixed climbing anchors to assist in climbing challenging rock faces. These permanent fixed climbing anchors deface the rock walls, degrade the area's wildness, and are prohibited by the 1964 Wilderness Act."
- "My biggest concern is the use of a minimum requirements (MR) analysis to determine whether a prohibited use (installations and/or motorized equipment) is necessary. Anyone that has been involved in an MR process understands there is plenty of room for subjectivity and the result is only as protective as the intentions of those entrusted to implement the intent of the Wilderness Act. Your need statement includes that "many bolts and anchors currently need or will need to be replaced". We on the Bitterroot have already seen the climber's "safety" card raised: "Current best practices consider handheld, battery powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts" and you can expect proposals to authorize motorized drills for maintenance. Opening the door to use of MR analysis for proposed recreational prohibited uses rather than agency administrative actions not only contradicts the intent of the Act but sets the agency up for an on-going workload you can ill afford - prohibit use of mechanized equipment for fixed anchor maintenance (including for the category "Traditional Climbs" in your Climbing Route Categorization PDF)."
- "It is reassuring to see that the NPS Branch of Solicitor's Office has determined fixed anchors and fixed equipment in wilderness to be installations, this coupled with a statement that courts are likely to consider fixed anchors to be installations under the Wilderness Act (something I was happy to pass on to the Bitterroot NF!)."
- "I agree with the park's stance to make needed material replacements for safety as well as removing rock climbing infrastructure where applicable. Indeed in Wilderness, as stated by the act in section

4c, there shall be no permanent infrastructure except to meet the minimal needs of park administration.”

**Concern Statement:** Commenters expressed concern that the proposed plan takes an unprecedented approach to managing bolts in wilderness areas that defaults to anchors being prohibited until proved otherwise:

- The plan would inhibit the development of more sustainable, environmentally friendly routes.
- The National Park Service considering fixed anchors to be installations is a new interpretation of the Wilderness Act.
- The National Park Service considering fixed anchors to be installations would create a presumption that anchors are prohibited in wilderness.
- The National Park Service already has the tools it needs to effectively manage climbing in wilderness.
- Director’s Order 41, section 7.2, outlines clear management guidance for regulating fixed anchors in designated wilderness.
- Director’s Order 41 does not treat fixed anchors as prohibited installations, nor does it require a MRA for recreational climbing fixed anchors. Although it does require an MRA for administrative purposes such as search and rescue.
- 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, could be implemented.
- A blanket policy of fixed anchor prohibition in wilderness will reduce recreational opportunities in wilderness for climbers raised on sport climbing, who tend to be younger, more urban, and diverse than climbers who were raised on traditional climbing.
- The National Park Service has cherry picked sections of law, regulations, and policy to try to convince the public that fixed anchors are prohibited in wilderness.
- The large majority of bolted routes in wilderness are infrequently climbed, and the wilderness character of the areas where they are located are well-preserved.
- Fixed anchor use in wilderness has already been vetted and policy created in Director’s Order 41.
- The proposed plan could set dangerous precedents for the National Park Service units that leaves too much discretion to leadership, which changes over time, at each NPS unit.
- The proposed plan does not align with current, nationwide definitions of bolting in wilderness, which opens up the park to litigation.
- The park could implement a straightforward process for approving replacement of existing bolts, perhaps with less review than currently required.
- Climbing, including the use of fixed anchors, is a historic use at the park and predates the first park wilderness designation in 1976.

**Representative Quotes:**

- “Joshua Tree National Park’s new climbing management plan gets a lot right--trail management, cultural resource protection, and more--but it takes an unprecedented, prohibited-until-proven-legal approach to managing bolts in Wilderness areas.”

- “There's no reason for JTNP to make unprecedented changes to the longstanding interpretation of the Wilderness Act when current NPS policy and management authority already provides sufficient guidance for managing climbing in Wilderness areas.”
- “Climbing is a vital part of community and culture within all parts of the country and world. By drastically changing the regulations you are stopping growth to allow climbing to become more sustainable for the environment. Instead we need more mentorship and infrastructure to help the sport change to be accessible and sustainable for all.”
- “The NPS already has established policies to regulate climbing in wilderness areas, such as prohibition of power drills. There is no need for JTNP to incorrectly reinterpret the wilderness act to meet the restrictive and prohibitive goals of the NPS managers who seek to further limit access to public lands.”
- “I can understand wanting to preserve Joshua Tree so that communities can enjoy the area for generations to come. However, these policies need to be inclusive of all community members, and that includes the rock climbing community. We have had access for decades, these routes should be carefully maintained and continue to be available. I think that the focus should be more on an inclusive strategy and less about harming the diverse makeup of the communities that enjoy the park.”
- “I agree with Access Fund's concerns that the proposed anchor management plan is ripe for setting dangerous precedents for the National Park System beyond J Tree, and that the proposal leaves too much discretion to the whims of changing leadership at the park. With the reinstated Bears Ears National Monument, it's my understanding that the federal land management's policies finally evolved to accept climbing as a legitimate use. I see the J Tree proposal as a potential step backwards.”
- “Whether it's defining what exactly constitutes a 'sport climb' or determining the minimum tool required to create safe access to/from routes (such as occasional bolted protection literally invisible to other visitors), the blanket policy of bolt prohibition in wilderness is a hurdle for younger climbers raised on sport climbing; the vast majority are visiting from the cities, are more diverse...”
- Cliffhanger Guides – “Director's Order 41 which went through an extensive public review process indicates that climbing is a legitimate and appropriate use in Wilderness and the language and prescription around fixed anchors are very reasonable and allow fixed anchors when no other alternative exists to safely ascend or descend. There has been much debate over whether the NPS has officially regarded fixed anchors as installations in the past, but it seems clear based on the definitions of installations in many agency documents includes any object that is assembled or created outside the wilderness and is left behind when the installer leaves the wilderness. Objectively, bolts fall into this category regardless of how they've been treated in the past. However, I believe that bolts are necessary to the administration of the Wilderness for recreational purposes in many cases and that both access and safety will be severely compromised if bolts are either removed or simply aged out of safe service by neglect and not allowing their replacement. They deserve to go through the minimum requirements exception analysis process as a whole but to do it on an individual basis is completely impractical and would be all but impossible to do in reality. I believe the Park Service has the right to do this analysis and make decisions about what is appropriate use of fixed anchors and should do all that the law requires for analysis in order to both correctly administer for wilderness values and to prevent lawsuits from organizations claiming that the park has not correctly gone through the legal process for creating a minimum requirement exception.”
- “DO #41 also states that the “of bolt-intensive face climbs is incompatible with wilderness preservation. This language does not impact existing routes (that were established years ago). DO #41 also importantly states that the CMP will address ways to control fixed anchors to protect the

park's wilderness character - which clearly means the decision to allow bolts on a particular route boils down to more than the density of bolts - and has more to do with how many people will go there, how much the land will become "and such considerations. It is clear that the large majority of bolted routes in the wilderness are infrequently climbed, and the wilderness character of the areas where they are located are well-preserved. In my understanding, this language is to prevent large scale ("bolting of crags that would attract large groups and have a huge impact on the land and wilderness character. That has not happened anywhere in Joshua Tree, so the CMP should not suggest that this is a current problem that needs to be addressed (but just a need to continue to prevent it in the future, as the park has already been successful in doing)."

- "DO #41 says "anchors or fixed equipment should be rare in wilderness" - that is clearly the case, with bolts spread intermittently throughout hundreds or thousands of acres, where they are not visible to non-climbers. DO #41 also says: "WILL be required for the placement of new fixed anchors or fixed equipment. Authorization MAY be required for the replacement or removal of existing fixed anchors or fixed equipment" (emphasis added). According to these guidelines, the NPS could have a very straightforward process for approving replacement of existing bolts, perhaps not requiring the same level of review as currently required, if that removes some of the burden from park staff. The language is clear that authorization is required for new routes, but it is through this process that the NPS can ensure that bolts remain in wilderness."
- American Alpine Institute – "As I'm sure you're aware Section 7.2 of the 2013 Director's Order outlines how fixed anchors should be managed in Wilderness. The order does not define fixed anchors as prohibited installations and it does not require a Minimum Requirement Analysis for recreational climbing anchors. It is our position, that the NPS should use this tool to manage Wilderness climbing."
- "Fixed anchor use in wilderness has already been vetted and policy created in DO #41. With national level guidance in place it is inappropriate for an individual NPS unit to try and change that policy at the unit level. Beyond the park specific issues, changing the interpretation of the Wilderness Act could lead to safety issues and damage the relationship between conservation and human-powered outdoor recreation groups around the country. Joshua Tree would not be the same amazing park without the role of climbers over many generations. JTNP should continue to use the current policy and tools it has to manage climbing in wilderness and utilize climbers as stewards, rather than attempting to undo years of collaboration and partnership."
- Access Fund – "Climbing--including the use of fixed anchors--is a historic use at JTNP and predates the first JTNP Wilderness designation in 1976."
- Access Fund – "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.”

- Access Fund – “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.”
- Access Fund – “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.”
- Access Fund – “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.”
- Access Fund – “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 and many of our local climbing organizations.”

- “Thus far, in this climbing management process, the park has cherry-picked sections of law, regulations and policy to try and convince those not able to take a deep dive into the situation to believe that fixed anchors are prohibited in wilderness. The park has now shown a pattern of being less than truthful in this regard. As an example, the park has only referenced the portions of DO41 that fit their narrative and failed to mention that DO41 explicitly states that fixed anchors are allowed in wilderness or that laws like the Dingell Act allow placement, use and replacement of fixed anchors.”
- “There are VERY several significant issues with the wilderness-bolting portion of this plan.

(1) Your proposal does not align with current, National-level definitions of bolting in wilderness.

This opens up the park to litigation on many fronts including (a) changing the definition of bolts to an “without the express input and approval of Congress; and (b) creating a scenario where bolts cannot be easily replaced and unnecessarily increasing the danger/risk of climbers. Litigation, which can be avoided, frankly, is a waste of park resources.

(2) Wilderness is defined as outstanding opportunities for solitude or primitive and unconfined type of recreation.

Bolting is not counter to this definition - in fact, bolting allows for unconfined recreation by being able to access rock faces that would otherwise be too dangerous to climb using only traditional gear.

The key element of the wilderness definition is solitude. Wilderness boundaries and bolting placements should be defined by this.

For example, having a wilderness boundary near a major road or parking lot, makes zero sense. And, limiting bolting or climbing near already existing high-traffic areas also makes very little sense.

Conversely, if there is a bolted climb, deep in the wilderness that very few people bother to access, this bolted climb meets the definition of wilderness - there is solitude and unconfined recreation.”

- Boulder Climbing Community (BCC) – “we strongly agree with the Access Fund's position that JTNP should not take the unprecedented step of declaring that any fixed anchor is an "installation" and therefore automatically subject to the restrictions of the Wilderness Act. Among other sources of authoritative and persuasive guidance, the Department of the Interior has repeatedly affirmed that fixed anchors are not broadly incompatible in Wilderness Areas. In its 2007 Instruction Memorandum, 2007-084, BLM instructed that permanent fixed anchors, placed by hand-powered drills, "may be appropriate in Wilderness Areas ... to reduce impacts on vegetation or soils". The instruction also endorsed the appropriateness of "[p]lacing a few permanent anchors to improve climbers' safety on sections of routes where the use of removable hardware is not feasible." The latter situation was distinguished from those where "[e]stablishing new routes ... contribute[s] to an unacceptable density of climbing activity." The Department followed the same interpretation of the Wilderness Act in its 2013 DO #41 which discouraged "bolt-intensive face climbs" but expressly recognized that the "occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act.

Those directions are not only consistent with the text of the Wilderness Act, they also recognize that fixed anchors are not, by themselves, inherently a problematic installation. Rather, they can promote safe climbing practices, enable climbers to more fully experience these areas, and even reduce impacts to the ecology. Having a few bolts on a predominantly trad route, or as rappel or belay

anchors, is broadly compatible with responsible recreation in Wilderness Areas. To be sure, when "bolt-intensive face climbs" threaten to create an undue density of climbing, restrictions are appropriate. Our experience in the Wilderness Areas of Rocky Mountain National Park confirms that fixed anchors, per se, are not the problem. Indeed, allowing climbers to safely rappel a route may reduce impacts, relative to topping out and descending via another route. And, selective use of bolts can preserve the wonder and adventure of a Wilderness Area.

Interpreting the Act as broadly banning fixed anchors would create inconsistency across Wilderness Areas, especially given the long history of fixed anchors in those Areas. While each area's manager needs to address specific situations in light of the local context, they should all operate under the same basic national guidance. Land managers and climbers benefit enormously from having predictability on the governing rules."

## **FIXED ANCHORS: PERMITTING**

**Concern Statement:** Commenters expressed concern that efforts to replace existing fixed anchors in wilderness areas would result in managers removing routes mentioned in permit requests:

- The park should make good faith efforts to replace existing fixed anchors in wilderness areas and not remove anchors mentioned in permit requests.
- There are 400+ sport routes in wilderness. The park should treat these routes the same as traditional bolted climbs for fixed anchor maintenance.

### **Representative Quotes:**

- "JTNP should provide assurances that good faith efforts to replace existing bolts in Wilderness areas will not result in managers removing routes mentioned in permit requests."
- "I hope you chose to remove the bolting and anchor restrictions from the new climbing management plan. And I hope you do not remove bolts from the routes mentioned in the permit requests."
- "There are 400+ "Routs" in Wilderness. These routes should have the same consideration from maintenance as "Bolted" climbs."

**Concern Statement:** Commenters suggested that permits should be required, for installation or replacement of fixed anchors and associated equipment, in all locations:

- The park needs to address proper bolting technique and ethics.
- The park should implement a permitting process for adding new bolts within the park wilderness.
- The plan should clarify the permitting process for installing, replacing, and removing fixed anchors.
- The park should consider the route and its resource impacts.
- The park should make replacement of existing bolts less stringent in the approval process.
- The park should implement a permitting system that documents which bolts have been replaced.
- The park should include an easy, fast, transparent permitting process in the plan.
- The park should develop criteria for permitting new sport climbs such as: route developer's experience, use of rock-colored fixed anchors, and justification for use of anchors.

### **Representative Quotes:**

- "Require permits for installation or replacement of fixed anchors and associated equipment in all locations."

- “A permitting process for adding new bolts is appropriate within the park/wilderness. Replacement of existing bolts should be less stringent in the approval process, and the Friends of Joshua Tree (FOJT) are an excellent example of the type of organization that should help maintain fixed anchors throughout the park, including wilderness.”
- “What needs to be addressed is proper bolting technique, and ethics. I can see obtaining a permit to bolt but not banning them out right.”
- “My suggestion is to make camouflaged bolts a requirement, and also (in a place like JTNP, where so many routes have already been established) to implement a permit process to establish new routes needing fixed gear.”
- “I would like to express my clear desire to see this particular bolt management aspect changed, by providing the ability to make good faith efforts to replace existing bolts in Wilderness areas, and not to remove bolts mentioned in permit requests.”
- “JTNP should provide assurances that good faith efforts to replace existing bolts in Wilderness areas will not result in managers removing routes mentioned in permit requests.”
- “I think the permit system is lovely. It documents which bolts have been replaced and allows the park to close areas so bolts can be replaced without endangering or inconveniencing other people. I encourage JTNP to work with the American Safe Climbing Association (ASCA) and the Access Fund (AF) intensely with this process. The ASCA provides hardware to individual volunteers to replace bolts. The AF provides tools to remove bolts while preserving the original hole so it can be used again. By working in conjunction with the ASCA and AF, JTNP can create a list of folks who may be qualified to replace dangerous hardware. These valuable people should be respected by the park for the great service they are providing for free. This process should not be retarded by bureaucracy; bolts that need replacement need to be replaced quickly.”
- “A compromise already exists - a bolting permit process are reliable and enforceable within the existing logistical environment.”
- “Requiring permits for fixed anchors and "associated equipment" in all JOTR park locations including front country”
- “It is important that the NPS continue to have an easy process for permits to re-bolt or establish new bolted routes.”
- “It is not acceptable to age out bolts. Disrupting the wilderness further with notices and signs is unsightly and unsafe. Having an easy, fast transparent permit process should be a key goal of the climbing management plan.

The climbing management plan should focus on improving the management of the permit process for management of bolts and fixed anchors. The wilderness bolts are a key part of climbing history and safety. Minimizing impact on indigenous cultural history, social trails is a far greater threat to wilderness areas.

While classifying climbs by the number of bolts seems simple, this will create an unsafe environment for climbers to best protect climbs. While the current staff is doing a good job at assessing permits the process is highly staff dependent. For climbs that fall into a sport category of too many bolts there should be an advisory board of experienced climbers, bolt replacement experts that aid in the evaluation.”

- “I believe that climbing activities should be strictly permitted with rigorous requirements for location and equipment. Funds from permits can only go so far to repair damage. Some aspects of the



damage to the environment may never be recovered. So fees really do not protect but very strict oversight will help.”

- “New route development or hardware installation by other parties should be limited through a permitting process and some particularly sensitive areas may need to be closed.”
- “A permit system shall be developed for the establishment of new "sport" climbs in Wilderness Areas. The JTNP Director, or Director's designee, shall administer the permitting of new "sport" climbs in JTNP wilderness areas. Criteria for permitting new sport climbs shall be: Route developer's experience, Use of rock colored bolt hangers, Justification for use of bolts”
- “I say tighten regulations, issue fewer permits, only allow climbing in a couple of prescribed areas.”
- “Bolt Installation/Replacement. Whereas I agree with the requirement for permits for installation and replacement of fixed anchors for all locations,…”
- “I believe that the current requirements for bolt placement and replacement are excellent. There are so many unnecessary bolts in the park, but also a great number of bolts that would benefit from modern safety replacement. Permitting allows for a balance for these needs.”
- “Part of the CMP is to clarify the permitting process for installing, replacing, and removing fixed anchors. This is a major friction point to many people who don't know what this plan entails. When knowledge is distributed, people often see the reasoning for regulation as permissible and acceptable.”
- “In the presentation, in the matter of permitting, the term “permit” appeared, seemingly in reference to the process of permitting. However, what should receive some attention when considering anchors, bolts, etc. is a requirement for designating the route to the particular site, so that before a permit is issued, there is consideration of the route and its resource impact, as a proactive measure. Once a new dramatically appealing site is discovered and identified, well, “you build it, they will come..”

## **MOTORIZED DRILLS IN WILDERNESS: SHOULD BE ALLOWED**

**Concern Statement:** Commenters suggested that power drills should be allowed for fixed anchor installation and replacement:

- The park should allow the use of power drills only for the purpose of replacing bolts.
- The park should allow the use of power drills due to the poor condition of many bolts in the park because it is extremely difficult to get deep enough into the rock to safely replace bolts.
- The park should allow the use of power drills because hand drilling results in lower quality, less reliable, shorter-life installations.
- The park should allow the use of power drills for a short duration rather than the use of a louder manual drill for a long duration.

### **Representative Quotes:**

- “Climbers would like the use of power tools for and only for the purpose of replacing bolts. This is very important for safety.”
- “Power tools (primarily drills) are essential for replacing old bolts, without power drills it is extremely difficult to get deep enough into the rock to safely place bolts. Bolt technology has come a long way since many of the bolts in Joshua Tree were put in and other factors such as erosion and rust have made many old bolts unsafe to climb on. Bolts are already so few and far between on many routes that if a bolt were to fail it could be disastrous. Continuing to allow permits for power drill

use in the wilderness is very important to keep climbers safe. A lifeflight because of a failed bolt in the backcountry will cause far more economical and environmental impact than a power drill.”

- “Lastly, the NPS should allow re-bolting with power drills in the wilderness, at least for replacing old bolts (if not for establishing new ones). The poor condition of many bolts in Joshua Tree is well known and it is simply impossible to replace them without allowing power drills. Although the Wilderness Act specifically prohibits motorized equipment, it suggests that such equipment (along with roads and commercial enterprise) may be permissible “necessary to meet minimum requirements for the administration of the area.” Re-bolting routes that have become dangerous can be considered necessary to meet minimum requirements.”
- “The battery-powered electric drill is the minimal tool required to install/maintain/replace bolts in the Wilderness. Hand drilling results in lower-quality, less reliable, shorter-life installations. I would rather hear a power drill for a short duration than pounding on a manual drill for a long duration.”
- “The fixed anchor management plan mentions that electric drills are not allowed in wilderness settings. This makes sense if we think of “in wilderness = bad” but if we think of the bigger picture intentions of the wilderness act as creating places that “devoted to public recreation” and “outstanding opportunities for solitude” then hammering bolts for hours in the rock makes absolutely no sense. I fear that the arduous task of hammering (vs electric drilling) could lead to a lack of bolt maintenance in an already under-funded section of the park's priorities.”

## **MOTORIZED DRILLS IN WILDERNESS: SHOULD BE PROHIBITED**

**Concern Statement:** Commenters suggested that the park should prohibit the use of power drills for placing anchors in wilderness:

- The park should prohibit the use of power drills for placing anchors in wilderness because they are not allowed by law.
- The park should prohibit the use of power drills for placing anchors in wilderness because installing permanent fixed anchors goes against the intent of wilderness.
- The park should prohibit the use of power drills for placing anchors in wilderness because the labor of hand drilling into the hard monzonite will be a deterrent to installing fixed anchors.
- The park should prohibit the use of power drills for placing anchors in wilderness because drilling or hammering anything into rocks in the park is an aggressive abuse of the environment.
- The park should prohibit the use of power drills for placing anchors in wilderness because fixed anchors are inappropriate in wild spaces.
- The park should prohibit the use of power drills for placing anchors in wilderness because allowing permanent anchor installations or fixed apparatus sets a new and inherently dangerous precedent that will create a template for other wilderness areas to follow.

### **Representative Quotes:**

- “The NPS should prohibit the use of electric drills for placing such anchors in Wilderness.”
- “This is a very delicate area and must be protected from any permanent climbing bolts which would deface this glorious place.”
- “Motorized drills are prohibited from all established Wilderness Areas, by Statute. While long-established hand drills may be allowed, their evidence of rock-rape remains forever, long after the departure such abusers.”

- Terra Advocati – “We are voicing our objection to defaced rock walls with permanent anchors so climbers can climb rock faces. The wilderness areas of the park should hold true to the vision and intent of Fixed climbing anchors are an affront to the whole concept of wild spaces. Defacing rock walls to accommodate climbers is anathema to the idea of primitive hiking, camping and climbing. We oppose the use of any permanent damage to any areas in Joshua Tree.”
- “They and the noise of the drills used to install them contribute to degradation of the park and wilderness areas.”
- “Rock climbers in wilderness areas must not be allowed to utilize permanent climbing anchor installations or fixed apparatus to the rocks.”
- “As for concern about the exponential proliferation of heavily bolted sport routes, so long as power drills are not permitted, I think the labor of hand-drilling into the hard monzonite will be enough of a deterrent for all but a few denizens to spend so much time drilling.”
- “Other parks have mitigated the issue by simply requiring they be hand-drilled to stick with the restrictions against powered tools in the backcountry, and that has not been an issue”
- “Positioning anchors and bolts as an installation sets a new and inherently dangerous precedent that will create a template for other wilderness areas to follow.”
- “For me drilling or hammering anything into rocks within the park is an aggressive abuse of the environment especially one as treasured as Joshua Tree Park. I do hope that aggressive lobbying by groups, businesses and folks allied to the 'sport' don't drown out the voices of those who more passively love, enjoy and respect the park.”

## **MOTORIZED DRILLS IN WILDERNESS: SHOULD BE MANAGED**

**Concern Statement:** Commenters suggested that the use of power drills for fixed anchor placement should be allowed in wilderness under certain circumstances. There should be an exemption for power tool use to replace existing bolts in wilderness because only a power tool can cleanly remove old unsafe bolts so that a new bolt can go into the existing hole.

### **Representative Quotes:**

- “I would like to see the ability to get a permit to replace these established back country route anchors with the use of an electric drill upon approval from the permitting office. Electric drilled holes are better quality, take far less time to create (thus less interruption to the wildlife) and will ensure that people don't get injured from failing hardware in the worst possible environment (back country). The new standard for bolting in the park is 1/2” bolts, which is virtually impossible to drill with a hand drill.”
- “Managing bolts in wilderness areas by restricting power drills works well in Yosemite and has worked well in Joshua Tree. A total ban is unnecessary and would be dangerous.”
- “An exemption for power tool use to replace existing bolts in wilderness should be granted. Oftentimes only a power tool can cleanly remove old unsafe bolts so that a new bolt can go into the existing hole. Other wise a new hole has to be drilled and it looks terrible.”

## **CHALK**

**Concern Statement:** Commenters provided suggestions on managing the use of chalk in climbing:

- Sand colored chalk camouflages with the rock.
- Climbers could brush off chalk while descending.

### **Representative Quotes:**

- “As far as chalk, I used to use a sand colored chalk that was almost invisible on most rock.”
- “There are a few ethics that climbers could promote and encourage throughout the park that can preserve a sense of wilderness. One action is brushing chalk off routes while descending. In certain areas of Europe, nearly all climbers will brush their chalk and ticks off a route while lowering back down. If everyone does this, it can drastically lower the visual impact of chalk on a route. By making this required in wilderness areas and encouraged everywhere else, we can preserve the look of the rocks. This is something that will have to be promoted by the park as well as climbing organizations like the Access Fund and American Alpine Club.”

## **5.7 PLANNING PROCESS**

### **NATIONAL ENVIRONMENTAL POLICY ACT**

**Concern Statement:** Commenters provided feedback regarding NEPA compliance including:

- Questioning the need, appropriateness, or legality of the plan.
- The National Park Service should recognize the importance of describing the environmental setting of the park, especially the pristineness of the wilderness.
- The National Park Service should prepare an environmental impact statement (EIS).

### **Representative Quotes:**

- “The National Park Service is the steward of our public National Park lands. In even considering giving a specialty group, climbers, a “Management Plan” in Joshua Tree, you are going against all the hallowed precepts of your organization, the most important of which is an egalitarian code that DOES NOT favor one special interest group.”
- “You are the guardians of Joshua Tree, and as such, are required to withdraw this Climbing Management Plan immediately.”
- Sierra Club – “It is also critical that the Plan and its NEPA review fully and accurately describe the environmental setting, especially for JTNP's designated Wilderness, which is among the most pristine Wildernesses in the West, being in an extraordinarily primitive state. There are very few administrative roads. Access is primarily by undeveloped and unsigned routes, with few constructed trails, the California Riding and Hiking Trail being a notable exception. Aboriginal and abandoned mining trails are used but rarely signed or maintained. Here or there may be a wildlife guzzler or weather station, but there are no ranger stations, bridges or the like. Virtually the only man-made installations are isolated remnants of historic ranching and mining. Native American cultural sites abound, but are fortunately little known or vandalized. Properly managed, JTNP Wilderness can offer a truly exceptional primeval experience.

The Plan should also describe the morphology and topography of what is considered desirable climbing rock in JTNP, where the most of highly favored granite monzonite formations are easily back-climbable and relatively short, in contrast to the monolithic domes and spires encountered in the Sierra and elsewhere. Unbroken rock slabs hundreds of feet tall may justify use of fixed anchors, but JTNP's formations generally do not.”

## **APPEALS**

**Concern Statement:** Commenters recommended that the park include an appeals process, related to bolting decisions, in the plan.

### **Representative Quotes:**

- “Please consider an appeals process.”
- “I urge reconsideration of the decision and adoption of a reasonable appeals process with respect to new bolting and bolt removal in wilderness areas ...”
- “... no recourse for climbers to appeal something we deem unreasonably excessive. Climbers as a whole will be more knowledgeable about these matters.”

## **5.8 IMPLEMENTATION**

### **TREATMENT AREAS**

**Concern Statement:** Commenters suggested that more popular climbing areas should receive attention first, including Lost Horse Road and Hall of Horrors.

#### **Representative Quote:**

- “My only issue is with the treatment area. I think there are some areas that are more popular than Atom Smasher, Outer Mongolia, and Geo Tour that should receive attention first, such as the areas near Lost Horse Road, and Hall of Horrors.”

### **IMPLEMENTATION LOGISTICS**

**Concern Statement:** Commenters provided suggestions regarding plan implementation including:

- The park should maintain open communication with the climbing community.
- The park should involve the climbing community, especially established climbing organizations, in climbing management decisions by being included in an oversight board.
- The park should use volunteers, especially via local climbing groups, for bolt replacement and trail work, and build relationships with volunteers.
- The park should implement bolting parties where a cliff was shut down and have bolters work in one area at a time with high use areas completed first.
- The park should partner with universities, community organizations, or other government agencies to use implementation of this plan as a research opportunity related to recreation management in the desert.
- The National Park Service needs to provide increased funding for climbing management at the park, including for trails, signs, staff, search and rescue, maps, hardware, and education.
- The park needs to provide additional education for the climbing and bouldering communities.
- The park should define permitting procedures clearly in the plan and allow for expedient replacement of fixed hardware.

#### **Representative Quotes:**

- “The park might think about shutting entire cliffs down, and have bolting parties. Get all the bolters to work in one area (high use first) not just because it is a route they want to climb.”
- Baboon Outdoors & Baboon Stewardship – “I like the proposed actions for this. But the community feels it may be abused to restrict climbing. If this is not the case, there needs to be open communication between both parties. Effective communication is hard because most climbers do not tune to these events, so the responsibility to disseminate may fall on local organizations like retail stores, outdoor brands, Joshua Tree NP, and guiding services.”

- “It is critical that the Park devote additional funding for climbing-specific resources and personnel, particularly in view of significant number of visitors using the park for rock-related activities. For example, the Park's staffing should reflect this reality. A single climbing ranger is not enough. Furthermore, funding and personnel must be added to evaluate and process any studies, permitting, etc. that may be required as a result of additional rulemaking (e.g., burdensome permitting processes) created by or caused as a result of the new climbing management plan.”
- “This new process should be clearly defined in the CMP and allow for expedient replacement of fixed hardware.”
- Cliffhanger Guides – “Unaffiliated Individual Honestly, this is on us as, the greater climbing community, to address. I am reaching out to organizations like The Access Fund and the American Alpine Club to try and convince gyms to have more education available in the form of Gym-To-Crag etiquette, because that's where the majority of climbers are starting these days.”
- “Climbing at Joshua Tree NP is a significant recreation activity. The programs that manage this activity need to be properly funded. Friends groups such as Friends of Joshua Tree and the Access fund need to have seats at the table so to help Joshua Tree NP meet its management objectives. This can be accomplished by creating an oversight board made of persons in the community. The previously mentioned organizations can send delegates of their choosing to assist. It seems there are many misunderstandings at the current management level. An an example would be that some managers believe D.O. 41 prohibits bolting. Replacement of bolts is necessary and essential for the safe and continued historical use of Joshua Tree NP's vertical environment. The CMP must identify and fund staff necessary to for the continued protection of this sensitive resource. Dedicated climbing rangers are needed for the public interface within the community.”
- “Use volunteers for bolt replacement and social trail mitigation working with groups such as Friends of Joshua Tree to organize and build relationships with volunteers. Climbers are an important user group in the park. Working with them will prevent damage to park resources and build a good relationship with this active and involved park visitor.”
- “Finally, I would love to see JTNP partner with universities, community organizations, or other government agencies to use the implementation of this plan as a research opportunity. There is so much to be learned about how recreation is managed in the desert and this seems to be a prime opportunity to measure impacts of management decisions.”

**APPENDIX A**  
**Summary of Comments Previously  
Received During Civic Engagement**

## Summary of Comments Previously Received During Civic Engagement

The park received over 2,400 comments related to trails, fixed anchors, wilderness, and sensitive cultural and natural resources during civic engagement from April 14 to June 13, 2021. Some themes include:

- concern for potential loss of climbing opportunities;
- concern that changes to management of fixed anchors in wilderness would impact climbing safety;
- concern that prohibition of electric drills in wilderness would prevent fixed anchor maintenance;
- concern that Joshua Tree is proposing precedent setting policy different from other parks;
- concern for sensitive resources such as archeological sites and vegetation;
- support for formalizing a limited number of trails in heavily used climbing areas; and
- suggestion that fixed anchors should not be allowed in wilderness.

The National Park Service used comments from civic engagement to inform which issues will be carried forward for analysis in the environmental assessment and help shape a preliminary proposed plan and potential alternatives. Issues carried forward include:

- social trail impacts on natural and cultural resources;
- potential climber impacts on lichens and sensitive plant species from trampling, loss of soil crust, and erosion;
- potential climber impacts on nesting raptors (birds of prey);
- potential climber impacts on cultural resources, including rock art and ethnography, from direct and indirect disturbances;
- historic and cultural significance for traditionally associated Native American communities;
- current management practices are not consistent with new policy guidance on fixed anchors in wilderness; and
- potential safety issues with aging bolts that need replacement.





**APPENDIX B**  
**Scoping Newsletter**

