



Climbing Management Plan Rock-Based Recreation in Joshua Tree National Park

January 2022 Update

Dear Friends and Neighbors,

Joshua Tree National Park is developing a climbing management plan, which also considers bouldering, highlining, and slacklining. This newsletter includes

- the purpose, need, and objectives of the proposed management plan;
- an explanation of relevant law, policy, and challenges;
- our progress since the last newsletter;
- the results of civic engagement; and
- a preliminary description of what could be in the plan.

This newsletter is being distributed to park neighbors, partners, and stakeholders to solicit comments on the plan, so please send your thoughts, ideas, and concerns, either online or in the mail.

To comment online and for additional information, including an upcoming public meeting on February 8, please visit the plan website at www.nps.gov/jotr/getinvolved/climbingplan.htm.

Comments can also be mailed to the following address:

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

Questions can be emailed to JOTR_planning@nps.gov.

We look forward to hearing from you.

Sincerely,

David Smith, Superintendent



Why is the plan needed?

- The park's Backcountry and Wilderness Management Plan (2000) guides climbing management, but it falls short when considering that visitation has more than doubled and many bolts and anchors currently need to be replaced or will need to be replaced soon.
- The official park trail system does not include trails to climbing and bouldering areas making it difficult for the park to fund trail improvements.
- Current management practices are not consistent with new agency guidance on fixed anchors in wilderness. Of an estimated 6,082 climbing routes in the park, 1,720 (28%) are in wilderness.
- Lack of delineated trails to rock formations and bouldering areas has negatively affected vegetation, cultural resources, and soil crusts. Open desert terrain makes it challenging to manage trampling from foot traffic.
- Current management practices have had mixed results in reducing impacts on natural, cultural, and wilderness resources.
- Traditionally associated Native American community values were not adequately incorporated into previous management plans.
- A transparent and repeatable process for evaluating the appropriateness of recreational climbing or related activities around cultural sites is needed to better inform management actions.
- A Climbing Management Plan is needed to address the park's unique resource challenges to find an appropriate balance between recreational use and the preservation of cultural and natural resources.
- An estimated 1,121 bouldering problems exist in the park (105 in wilderness). Bouldering, highlining, and slacklining activities have not been evaluated for their appropriateness at the park. This is required by agency policy for any new forms of recreation in parks.



Wilderness and Fixed Anchors

- The Wilderness Act established the National Wilderness Preservation System and instructed federal land management agencies to preserve wilderness character.
- Section 4c prohibits certain uses, including installations, except as necessary to meet minimum requirements for the administration of the area.
- National Park Service (NPS) Wilderness Policy defines an installation as, "Anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness." Based on this definition, and in consultation with the NPS Branch of the Solicitor's Office, the National Park Service has determined that fixed anchors and fixed equipment in wilderness are installations.
- The National Park Service recognizes climbing as a legitimate and appropriate use of wilderness.
- The use of removable anchors may reduce, but does not in every case eliminate, the need for fixed anchors.
- Fixed anchors are primarily used when rock features will not accommodate removable anchors.
- Occasional placement of a fixed anchor does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act.
- Fixed anchors or fixed equipment may be appropriate but must be closely managed under the direction of an approved plan.
- The establishment of bolt-intensive face climbs, commonly known as "sport climbs," is considered incompatible with wilderness preservation and management.
- Parks must complete a minimum requirements analysis to document the determination of whether a prohibited use—such as a permanent installation of a bolt or anchor, if proposed as part of a project—is necessary to meet minimum requirements for the administration of the area for the purpose of wilderness (Section 6.4, Director's Order #41).
- Numerous fixed anchors are present in the park wilderness.
- The park issues special use permits to climbers to install and replace fixed anchors; however, there has not been a process to evaluate the necessity of fixed anchors in wilderness including consideration of "bolt-intensive" routes.

What is the purpose of the plan?

The purpose of this plan is to guide the management of rock-based recreation activities for the protection of cultural resources, natural resources, and wilderness character, and to support the public's desire to enjoy the park through climbing and related activities.

What are the objectives of the plan?

- Identify access routes for heavily used formations and ensure approaches to routes avoid sensitive cultural sites and natural resources.
- Ensure fixed anchors in wilderness meet the provisions of Section 4c of the Wilderness Act.
- Clarify the permitting process for installing, replacing, or removing fixed anchors.
- Clarify the roles and expectations of professional guides and special use permit holders, including a determination of necessity for their operation in wilderness.
- Establish a framework for resource protection closures.
- Improve incorporation of the values of traditionally associated Native American communities.

What did we learn during civic engagement?

Over 2,400 public comments were accepted from April 14 to June 13, 2021. The park held a virtual public meeting on April 20, 2021, and has also held smaller meetings with climbers and tribes. We received a wide variety of comments on trails, fixed anchors, wilderness, and sensitive cultural and natural resources. 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
- suggestions that fixed anchors should not be allowed in wilderness.

The National Park Service used comments from civic engagement to help shape a preliminary proposed plan. Comments from the upcoming scoping period will be used to further refine the proposed plan, shape alternatives, and assist in described existing conditions and potential effects from implementing the proposed action or alternatives. Additional details are available at

<https://parkplanning.nps.gov/JOTRclimbing>.



What are some of the policy challenges of this plan?

- User groups have differing opinions regarding the appropriateness of fixed anchors in wilderness areas.
- Courts are likely to consider fixed anchors to be installations under the Wilderness Act.
- The National Park Service estimates there could be as many as 20,000 bolts in the park; 30% are in wilderness. Most power-drill installations after 2000 were unauthorized and lack environmental review.
- NPS policy recognizes that climbing is a legitimate use of wilderness; however, it does not allow for “bolt-intensive” climbs.
- Feasibility and safety concerns need to be considered with disposition of bolts incompatible with wilderness.

Where are we in the planning process?

The following nine steps summarize the planning process for the proposed climbing plan. We are currently on Step 4.

Planning Process Steps

- Step 1. Community engagement
- Step 2. Virtual public meeting to introduce the planning process to the public
- Step 3. Solicit public review and comment on issues and proposed management actions
- Step 4. Conduct formal National Environmental Policy Act (NEPA) scoping
- Step 5. Prepare draft plan/environmental assessment
- Step 6. Public review of draft plan/environmental assessment
- Step 7. Analysis of public comment
- Step 8. Prepare final plan/decision document
- Step 9. Release final plan/decision document to the public

National Environmental Policy Act

Implementing the proposed plan would be a federal action subject to compliance with the National Environmental Policy Act. This federal law requires agency and public participation in the environmental planning process. The National Environmental Policy

Act requires disclosure about the proposed action, alternatives, environmental effects, and mitigation. It requires environmental impacts to be considered during planning and decision making and results in informed and better decisions. “Scoping” is where a federal agency solicits public and agency input. The NEPA process will be documented in an environmental assessment, which considers a proposed plan and alternatives. The National Park Service will assess a no-bolt policy in park wilderness as part of a range of alternatives.

The plan must also comply with other laws, which are coordinated with the NEPA process. Compliance with the Wilderness Act, as previously described, and the National Historic Preservation Act will be important in the planning process.

National Historic Preservation Act

Oversight of the National Historic Preservation Act has been delegated to states; for the park it is overseen by the California State Historic Preservation Office.

- Section 106 of the National Historic Preservation Act requires federal agencies to identify historic properties and consider the effects of their undertakings on those properties.
- If historic properties are present, potential adverse effects must be assessed and mitigated.
- The park has proposed the use of a programmatic agreement with the California State Historic Preservation Office to ensure appropriate consideration of historic properties during implementation of the plan and allow for an expedited review process when no adverse effects to historic properties are identified.
- The park is actively consulting with traditionally associated Native American communities to develop this programmatic agreement and ensure their perspectives are incorporated and meaningfully heard.





What may be in the proposed plan?

The following summarizes the preliminary proposed action (plan). The environmental assessment will refine the proposed action and include more specific proposals to best meet the purpose of and need for action.

Components of the plan will include both programmatic management and implementable projects.

Fixed Anchor Management

- Continue to allow fixed anchors to be used in the existing Fixed Anchor Allowed Zone.
- Require permits for installation or replacement of fixed anchors and associated equipment in all locations.
- Assess fixed anchor installation for consistency with the Wilderness Act, including minimum requirements analysis and compliance with Director's Order #41.
- Assess fixed anchor installation or replacement for impacts to natural and cultural resources.
- Require compliance with fixed anchor replacement standards.

Access Trails

- Close and rehabilitate nonsuitable social trails using fencing, vertical mulch, rocks, and other physical obstructions.
- Formalize, construct, and manage appropriate access trails, according to NPS trail standards.
- Incorporate the formalized trails into the Facility Management Software System. Add signs to these trails to differentiate them from hiking trails.
- Require visitors to stay on trails in areas where resource protection is needed.

Treatment Projects

The park is exploring actions to address issues with access trails, fixed anchors, and social trail rehabilitation in climbing and bouldering areas of the park. Public input this past year identified a few areas as priorities to initiate these actions including the Astro Domes and Geology Tour Road Area. Additional priority areas could be considered with public input, however, ultimately all climbing areas will be managed according to the final plan. Details will be further described in the draft plan/environmental assessment. Input is requested regarding the proposed treatment areas described below.

- Establish and formalize trails. Rehabilitate social trails not incorporated into the formalized trail system.
- In cooperation with climbing partners, implement bolting/rebolting projects on select routes in priority areas that would (1) replace fixed anchors where needed for climber safety (including in wilderness, where appropriate); (2) remove bolt-intensive routes to comply with the Wilderness Act; and (3) fill and camouflage abandoned bolt holes.

- Partner with climbing groups to educate the public and work to immediately clean chalked tick-marks, which are difficult to remove when left uncleaned.
- Implement a communication/education program including signs, social media, park publications, targeted outreach to climbing gyms, commercial use permit holders, and guidebook authors.
- Monitor the areas post-treatment.

Sensitive Natural Resources

- Implement surveys, mapping, and monitoring of sensitive natural resources, including plants, lichens, and wildlife, in climbing and bouldering areas.
- Implement education programs regarding sensitive species for climbers. Limit the establishment of new climbing routes in areas with sensitive natural resources.

Cultural Resources

- Implement a decision-making process to manage cultural resources and rock-based recreation. This process would be used to assess impacts in conjunction with the bolting permitting system and inform treatment projects to protect cultural resources. The steps in the decision-making process would include identifying historic properties in consultation with Native American communities; reviewing for federal law applicability; conducting resource impact assessments; designing and implementing appropriate treatments for each impact; developing a monitoring plan; and drafting site-specific management plans where necessary.
- Implement archeological/ethnographic stewardship education programs for climbers, including involvement by traditionally associated Native American communities.
- Continue efforts to document the history of climbing areas in the park by conducting inventories and identifying historically significant climbs/routes and completing a historic resources study of the history of recreational rock climbing.

Highline and Slackline Activities

- Designate appropriate frontcountry locations.
- Identify appropriate slacklining and highlining practices, including anchoring practices.
- Require permits for installation or replacement of fixed anchors in frontcountry areas, and review permit requests for potential impacts to natural resources, cultural resources, or other recreational activities.
- Prohibit the installation of fixed anchors for highlining or slacklining in wilderness.

Commercial Services

- Manage commercial use authorizations to bring climbing guides into compliance with the Wilderness Act, including distinguishing authorized uses in wilderness versus nonwilderness.