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Comments: I am expressing my personal views herein and not those of any entity or organization with which I may otherwise be affiliated. I have over 40 years of involvement in land management both from a stakeholder (rock climbing representative on public lands recreational user groups) perspective and as representing local land management entities myself (public Boards and Commissions). If you wish to pursue further I am happy to disclose specifics.

I strongly believe that Climbing Management Plans are an important land use management tool and need to be implemented. The CMP for Joshua Tree National Park is a reasonable response to the needs and can be a model for other jurisdictions.

Background

Land managers historically use a number of criteria for evaluating land use issues. Most land managers view rock climbing as potentially a higher intensity land use than many other types of recreation. Land managers also use criteria to evaluate when the total land use is maxing out the land and its sustainability.

Type of Land Resource and Management Goals

Land managers have general guidelines they employ when evaluating uses. Front areas of parks tend to be locations of higher use. Back areas of parks away from most public foot traffic tend to be lower use. And if protection of the natural resources are a higher priority designations such as "Preserve" or "Wilderness" are employed to help managers know where to designate relatively more protection. Land managers have tended to consider intensive bolting as inconsistent with a Preserve or Wilderness designation.

Historical Perspective on Land Use Controls of Climbing

Many of the older, and more popular rock climbing areas, have developed climbing management plans that take into account:
1.when the human use has reached a maximum of sustainability
2.when a designation of protection as a Preserve or Wilderness is warranted
3.what steps the land manager are needed to manage and control rock climbing

Conclusions

1.It is reasonable for a Land Manager to judge that the capacity of a resource has been met and to take steps to ensure the sustainability of the resource.

2.It is reasonable for a Land Manager to judge that certain types of climbing activity, e.g., bolting, should be managed and controlled.

3.It is reasonable for a Land Manager to protect Preserve or Wilderness areas.

4.It is reasonable for a Land Manager to designate an area as a Trad Climbing area and limit Sport Climbing in order the protect the resource.

Specific Recommendations

1.It is important to keep rock climbing in the National Parks and US Forests and continue the appropriate use of fixed anchors, including bolts and other hardware.
2.Climbing management plans can assist land managers with ensuring the level of climbing activity is consistent with specific situations. (see JTNP's classifications attached)
3.Climbing management plans can be used to deal with circumstances where rock climbing should be minimized to protect sensitive environmental and cultural constraints with a policy of "no new bolts in new locations".
4.In general replacing old bolts/anchors is an important safety concern and should be addressed.