



Summary of NPS and US Forest Service Draft Climbing Management Guidance

The [National Park Service](#) and [US Forest Service](#) issued draft climbing management guidance for public comment on November 17, 2023. The public comment period is 60 days. If implemented, the guidance would create significant safety issues, threaten world-class climbing routes (many were established prior to wilderness designations), obstruct appropriate wilderness exploration, and burden land managers and climbers with unnecessary red tape.

Fixed anchors are essential pieces of the climber's safety system that allow people to safely and sustainably access vertical terrain. Without fixed anchors, many of the wildest and most inspiring places in America would become inaccessible to the American public.

The National Park Service draft guidance for managing wilderness climbing is very similar to the US Forest Service draft guidance. A summary follows:

1. **Fixed anchors are considered prohibited** "installations" in wilderness, a new interpretation of the Wilderness Act. The new policy creates a prohibition standard for authorizing existing, new, and replacement wilderness climbing anchors, going against nearly 60 years of policy and practice.
2. **New and replacement fixed anchors** may only be allowed after a [Minimum Requirements Analysis](#) (MRA) for prohibited uses. This new exception process will clearly limit fixed anchor authorizations and restrict the ability of climbers to make in-the-moment safety decisions. Every MRA decision document will open up the agency to litigation and the process adds an unnecessary bureaucratic step for managing sustainable climbing.
3. **Existing wilderness fixed anchors** are *de facto* prohibited but may be retained if the agency finds funding and resources to conduct MRAs; however, existing wilderness fixed anchors **may be removed** if they are determined to no longer be "the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character." Iconic, longstanding climbing routes may be removed at places like Joshua Tree, Rocky Mountain, Zion, and Yosemite National Parks.
4. **The proposed guidance presents a serious safety hazard.** The policy to restrict or prohibit the placement **or replacement** of fixed anchors unless specifically authorized through MRA determinations takes critical personal safety decisions away from climbers. The MRA requirement for fixed anchor replacement is unprecedented and would result in unsafe conditions because timely, routine fixed anchor maintenance would be obstructed or prohibited by unnecessary red tape. Traditionally, land managers do not maintain fixed anchors, whereas climbers are responsible for assessing and replacing fixed anchors during climbing activities.
5. **Land agencies do not have the resources to implement the unfunded mandate.** The guidance requires that land managers must develop climbing management plans (CMPs), or other relevant plans, for each federal land unit. There are currently very few CMPs in national parks and forests, and the agencies lack the funding and resources (and often expertise) to complete such plans. Understaffed and underfunded public land managers would be responsible for executing complex and resource-intensive requirements when they already have the authority to effectively manage climbing in wilderness.

The National Park Service draft guidance differs from the US Forest Service's draft guidance (or provides more specificity) in the following ways:

1. **Park planning documents may make programmatic decisions** about fixed anchor authorizations or restrictions at the park-wide level or within designated park management zones or units. Alternatively, the required MRA process may be deferred to individual anchor applications under a plan framework. Programmatic MRAs are only to be done after a park-wide CMP or other planning document is finalized.
 - a. NPS MRA process requires elevated standards for what is the “minimum necessary,” such as whether climbing is acknowledged in enabling laws or park planning and policy documents; history and ethics will also be considered as will how recreational climbing preserves the qualities of wilderness character.
 - b. The NPS draft guidance states, “It is important to note that recreational climbing is an appropriate activity in NPS wilderness that connects people with the land, builds self-reliance, presents challenge, and requires skill. These experiential values can provide opportunities for primitive and unconfined recreation and therefore be necessary to the administration of the wilderness area.”
2. **In the absence of a formal park plan** addressing wilderness climbing, park superintendents may evaluate individual requests to place or replace fixed anchors through an interim process, but individual approvals are still subject to MRAs. Park superintendents may also defer any wilderness climbing anchor decisions until a formal planning process is completed.
3. **Existing fixed anchors** may continue to be used but are subject to an MRA and may subsequently be removed. **Anchor replacements** require an MRA although a park-specific planning process may provide more direction regarding anchor replacements. MRA-approved existing anchors may be replaced without a new MRA, unless wilderness character conditions change.
4. **All new or replacement anchors** that are MRA-approved (even for programmatic MRAs) still require a **very detailed special-use permit** with requirements inconsistent with realistic, in-the-moment backcountry exploration. It is unclear whether permits must be issued where MRAs have determined that specific fixed anchors are the minimum necessary and the minimum tool.

The US Forest Service addresses non-wilderness climbing management (NPS does not):

1. **New fixed anchors and replacement of existing fixed anchors in non-wilderness would be restricted.** The policy would restrict the placement and replacement of fixed anchors to established “climbing opportunities” and would limit new anchor approvals only for new climbing opportunities that have been evaluated for natural and cultural resource impacts. “Climbing opportunity” is poorly defined as, “A user-created or primarily user-created dispersed recreation area on NFS lands with no, minimal, or limited Forest Service investment or amenities where climbing may be performed.” This standard is highly subjective and will be nearly impossible to manage and enforce.
2. **Existing non-wilderness fixed anchors** and fixed equipment may be used without restriction when consistent with the applicable climbing management plan, except in areas closed to climbing. Nearly 30% of America’s climbing (about 12,000 discrete climbing opportunities) is located on US Forest Lands, but only a few USFS climbing areas have an “applicable climbing management plan.” It is unclear whether this new standard also applies to wilderness anchors as well.