



## WILDERNESS WATCH

*Keeping Wilderness Wild*

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March 2, 2022

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

Sent via: <https://parkplanning.nps.gov/IOTRclimbing>

Dear Superintendent Smith and Joshua Tree National Park Staff,

The following scoping comments on the proposed climbing plan for Joshua Tree National Park come from Wilderness Watch, a national wilderness conservation organization. Our focus is the protection and proper stewardship of all units of the National Wilderness Preservation System, including the designated Wilderness at Joshua Tree.

Congress designated the Joshua Tree Wilderness in 1976 and, after additions in 1994, the Wilderness now includes about 595,000 acres of the total 795,000 acre-Joshua Tree National Park in southern California. The Park and its Wilderness continue to be popular with rock climbers.

In 2000, U.S. Secretary of Agriculture Dan Glickman appointed both Wilderness Watch executive director George Nickas and me (I then worked for a different wilderness organization) to serve on the Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee (FAWNRAC). We worked throughout 2000, and heard from Forest Service and National Park staff, climbers and climbing organizations, and wilderness conservation organizations. As a consequence of that intense experience, we are familiar with many of the issues related to fixed anchors in Wilderness. Wilderness Watch has remained active in trying to protect Wilderness from permanent fixed climbing anchors since that time.

Rock climbing is certainly an allowable recreational activity in designated Wilderness, 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 as permanent "installations" are prohibited by the 1964 Wilderness Act.

Section 2(c) of the 1964 Wilderness Act defines wilderness as an area without “permanent improvements.” The permanent climbing bolts and other permanent fixed climbing anchors are “permanent improvements” prohibited by the Act.

Section 4(c) of the Wilderness Act also prohibits any “structure or installation” in designated Wilderness. Bolts and other permanent fixed climbing anchors are included in this prohibition. The National Park Service should accordingly prohibit all new bolts and permanent fixed climbing anchors in the designated Wilderness portions of Joshua Tree.

In 1990, the USDA Office of General Counsel (OGC) determined that permanent fixed climbing anchors violate the protections of the Wilderness Act. The Department of Interior needs to face this issue head-on, finally, and also prohibit permanent fixed climbing anchors in designated Wilderness.

We were encouraged to read that the National Park Service also now recognizes that permanent fixed climbing anchors are installations in the context of section 4(c) of the Wilderness Act. With that in mind, we submit the following specific comments:

**1. Wilderness Watch strongly supports the NPS determination that fixed climbing anchors are installations** under the Wilderness Act.

**2. The NPS should prohibit the installation of all new fixed anchors in the wilderness** portions of Joshua Tree National Park, as well as the use of electric drills for placing such anchors in Wilderness. We believe that the Wilderness Act prohibits fixed anchors and that therefore fixed anchors should be banned. We don’t support allowing new fixed anchors being installed – certainly not by individual climbers – even if they have gone through a Minimum Requirements Analysis (MRA) or a Minimum Requirements Decision Guide (MRDG).

**3. Only removable anchors should be used for climbing in Wilderness.** This point aligns closely with the ethos of “clean climbing,” the “Leave No Trace” ethic that is taught around the country, and respects the wild character of designated Wilderness.

**4. Nothing in the Wilderness Act or federal regulations requires that all rock faces in Wilderness must be climbable;** if climbers can’t climb a wilderness rock face without defacing it with permanent fixed anchors, then they shouldn’t try to climb that face.

**We want to emphasize that it is inappropriate to allow recreationists to place fixed anchors under the MRDG process, or any other process.** The Wilderness Act prohibits installations, just as it does motor vehicles and aircraft. To suggest that the MRDG can be used to allow visitors to place installations is akin to suggesting an MRDG can be used to allow visitors to ride ATVs or snowmobiles in Wilderness, or to land a helicopter. The exception to the general prohibition can only be used for *administration* of the area after a finding the use of the exception is “necessary to meet minimum requirements” to protect the Wilderness.

Some climbers argue that some rock faces may not be climbable in designated Wilderness without the use of bolts or permanent climbing anchors, and that they need permanent bolts or other fixed climbing anchors in order to safely ascend these rock faces. But designated Wilderness is different

and special. In Wilderness, it's OK if some rock faces are unclimbable. Humans don't need to dominate and occupy every rock face in Wilderness, especially if climbers degrade the wildness of these areas and of these particular rock faces with permanent bolts. Climbers need to acquire the humility and restraint that all visitors in Wilderness need in order to protect these special places without the permanent marring and defacing that bolts and other permanent anchors inflict.

There is also the case that "unclimbable" rock faces of today may well be climbable in the future by increasingly skilled climbers who don't need permanent bolts or other anchors to complete a climb. As one example, renowned climber Alex Honnold scaled El Capitan in the Yosemite National Park Wilderness in 2017 without any ropes or other safety gear at all, a remarkable feat previously thought to be impossible. If a wilderness rock face is unclimbable today without permanent bolts, that doesn't mean it can never be climbed in the future without bolts. We shouldn't scar and deface those wilderness rock faces for the convenience of today's climbers, if more skilled climbers of tomorrow won't even need them.

Thank you for this opportunity to comment on the Joshua Tree National Park climbing plan.

Sincerely,

A handwritten signature in dark ink that reads "Kevin Proescholdt". The signature is written in a cursive, flowing style.

Kevin Proescholdt  
Conservation Director