

APPENDIX J:
CLIMBING MANAGEMENT STRATEGY

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CLIMBING MANAGEMENT STRATEGY

BACKGROUND

The National Park Service (NPS) recognizes climbing as a legitimate and appropriate activity for realizing unconfined and self-reliant recreational opportunities in wilderness. Aspects of climbing may affect wilderness character, including the qualities of natural, undeveloped, and opportunities for solitude (see wilderness character discussion in chapter 3). This climbing management strategy (strategy) is intended to provide guidance of climbing activities in wilderness while preserving wilderness character. Climbing has been a popular activity in the area comprising Sequoia and Kings Canyon National Parks (hereafter the parks), and the Sierra Nevada since the mid-1800s. The wide variety of peaks and rock formations in the parks provide excellent opportunities for a wide spectrum of climbing including rock, big wall, snow and ice, bouldering, canyoneering, caving, and mountaineering. It is a popular area for local, regional, national and international climbers.

For the purposes of this strategy, climbing is defined as ascending or descending very steep terrain, usually by using hands and feet to maintain balance, and typically utilizing ropes and anchors to prevent falls. This includes rock climbing, ice climbing, canyoneering, caving, rappelling, and other similar activities. The requirements for fixed anchors described below apply equally in all areas of the parks' wilderness, including above and below ground locations. The parks are in the process of developing an updated Cave Management Plan (CMP) and it is anticipated that the CMP will adopt the general guidelines of this strategy but expand on cave specific activities.

Climbing in its various forms continues to be a popular activity with the visiting public. Because climbing has resource impacts, managers strive to find a balance between allowing climbing to continue as freely as possible and controlling impacts on environmental resources and other visitors of the parks. A voluntary commitment to Leave No Trace© climbing techniques on the part of the climbing community is an important factor in ensuring the preservation of resources and wilderness character.

The parks and other areas in the Sierra Nevada have long been known for a strong traditional climbing ethic. The local climbing community in general does not accept practices that create undue impacts, such as adding bolts to existing routes or establishing new bolt-intensive routes. Chipping or gluing new holds is considered unethical and is prohibited. Clean-climbing techniques are generally the norm. It is incumbent on the local and national climbing community, along with the parks, to inform and educate climbers new to the area of this fact for the ultimate protection of resources and to maintain access to climbing areas.

Definitions of Key Terms

Clean climbing — a rock climbing term that describes techniques and equipment that climbers use in order to avoid damaging the rock by widening cracks or drilling holes. Clean climbing techniques may date back to the 1920s and possibly earlier. The term itself likely emerged around 1970 with the widespread and rapid adoption of nuts (also called chocks), hexes, and cams in the United States and Canada. These were adopted for use in preference to pitons, and at times bolts, which damage rock and are more difficult and time-consuming to install.

Fixed Anchors — consist of webbing, bolts, pitons, chains, and other devices and equipment permanently or semi-permanently attached to rocks (or other natural features) that are left in place after a rock climbing activity. These may be divided into two categories: 1) permanent anchors (e.g., bolts and pitons), and 2) removable or abandoned anchors (e.g., slings, nuts) with or without accompanying hardware such as carabiners.

Many impacts related to climbing, such as soil compaction and erosion, wildlife disturbance, or noise, are also associated with other forms of visitor use. However, other impacts are associated solely with climbing, such as the use of chalk or fixed anchors. These are discussed in more detail below.

The intent of this appendix is to focus on a limited set of issues, impacts, and mitigations that are directly related to climbing in wilderness. This appendix is not intended as a comprehensive climbing management plan, but will serve as interim guidance on climbing activities in the absence of such a plan. A future climbing management plan would more thoroughly document and analyze use levels and patterns, identify significant concerns, and implement detailed management actions to comprehensively address climbing related issues.

POLICY AND LAW

Climbing management in National Park wilderness is directly guided by relevant laws, NPS Management Policies, Director's Orders, and Reference Manuals. The U.S. Code of Federal Regulations, and the parks' Superintendent's Compendium also provide indirect and direct management control of climbing and related activities. Director's Order #41: Wilderness Stewardship, and its Reference Manual #41 (DO #41 and RM #41), provides specific guidance on the management of climbing in wilderness. In section 7.2 Climbing, it states: "If climbing activities occur in wilderness, climbing management strategies will be included as part of the park's Wilderness Stewardship Plan, or other activity-level plan. . . Wilderness climbing education and impact monitoring will be important components in climbing management programs . . . climbing practices with the least negative impact on wilderness resources and character will always be the preferred choice." Reference Manual #41 adds that, "Climbing has a history that predates the Wilderness Act, but wilderness is a unique resource that has overriding implications for all recreation uses, including climbing. Wilderness has a special status that compels all visitors to a higher standard of ethics and conduct."

Climbers accessing wilderness are subject to the rules and regulations of wilderness use as described in the WSP/FEIS and established in the Superintendent's Compendium. This includes possessing a valid wilderness permit for overnight use.

Specific federal regulations that relate to climbing and resource preservation include:

- Title 36 CFR 2.1 Preservation of natural, cultural and archeological resources - Prohibits practices of possessing, destroying, injuring, defacing, removing, digging, trundling (rolling rocks) or disturbing (chipping, gluing or gardening) from their natural state any park features.
- Title 36 CFR 2.2 (a)(2) Wildlife Protection - Prohibits feeding, touching, teasing, frightening, or intentional disturbing of wildlife nesting, breeding, or other activities.
- Title 36 CFR 2.12 Audio Disturbances - Prohibits the practice of utilizing motorized equipment or machinery that creates unreasonable noise, particularly in undeveloped areas (e.g., motorized rock drills, amplified sound devices).
- Title 36 CFR 1.5 (f) Closures and Public Use Limits - Temporary closures of specific climbing routes and areas will be enforced to ensure prudent management of raptor nesting areas where they coincide with popular climbing routes.

OBJECTIVES

- Provide opportunities for the pursuit of the traditional activity of climbing in the park's wilderness.
- Ensure that climbing activities do not unacceptably impact wilderness character or resources.
- Emphasize clean-climbing as the proper method to realize the benefits of climbing in wilderness.
- Promote strategies that “will address ways to control, and in some cases reduce, the number of fixed anchors to protect the parks’ wilderness resources or to preserve the ‘untrammelled,’ ‘undeveloped,’ and ‘outstanding opportunities for solitude’ qualities of the park’s wilderness character.” (RM#41)
- Work cooperatively with climbers and the climbing community to advance the practices of responsible climbing in wilderness.
- Provide education to the public on responsible climbing practices in wilderness.

IMPACTS OF CLIMBING AND MITIGATIONS

LITTERING / HUMAN WASTE

Non-degradable litter is common to all aspects of visitation. Litter as it relates to climbing, is deposited by climbers, climbing spectators and at bivouac (bivy) sites. Athletic tape is sometimes found at the base of crack climbs. Ledges and the base of cliffs have been found to have fecal matter scattered around. Some bivy sites pose a problem, since waste cannot be buried. Decomposition of waste is a problem at high elevations due to cold temperatures. Exposed waste poses health problems to other climbers or wildlife and degrades the aesthetics of the user experience.

Climbers, and other wilderness users, are required to clean up after themselves and pack out trash and garbage and follow waste management regulations. Climbers will be expected to pack out human waste when in an area where cat holes or other appropriate means of human waste disposal (e.g., privies) are not available or appropriate. Waste should never be dropped while on a climb (it should be tubed or bagged for later proper disposal).

EROSION

Off the Rock: Climbers and mountaineers often bushwhack and scramble to gain access to the base of their route. Very steep informal trails can result. These informal trails may be braided with other informal trails to the same climb. Because they travel straight up the grade, water is diverted along the path, causing soil loss, gullying and loss of vegetation. At the base of climbs in high use areas, the ground is typically compacted and denuded of vegetation. Informal trails often contour along the base of the rock formation to the start of other climbs.

When informal approach trails to the base of heavily used climbing routes are identified, climbers and the parks’ management will increase education efforts to discourage / disperse use in order to establish a sustainable pattern of use. In rare occasions, signs may be placed to direct climbers away from problem or sensitive areas in order to protect resources (after conduct of a minimum requirement analysis). Informal trails associated with climbing routes will be managed according to the guidelines in the Trail Management and Classification System (see appendix K). Dispersed travel to the base of climbs may be encouraged in specific cases.

On the Rock: Through continuous use, the rock surface becomes smoother and freer of lichens, moss and dirt. Ledges and cracks also lose dirt and vegetation from climbing traffic. Toe and finger holds become worn off. Some climbers alter routes by gluing on artificial holds or chipping or prying the rock to create or improve holds. The gluing and chipping of holds, and the intentional "gardening" or cleaning the rock of soil and vegetation, and rolling of rocks deemed as hindrances (trundling), are not legal, or ethical, in wilderness.

SOCIAL IMPACTS

While climbing is widely accepted in the parks, the activity has not previously been addressed through an approved plan, policy, or regulation. Under the Code of Federal Regulations, various aspects of climbing recreation are managed in order to protect the parks' resources. Climbers, and other wilderness users, have a variety of individual experiences and personal perspectives. The climbing community and the parks' staff will continue to work together to mitigate user conflicts and enact appropriate administrative actions.

NOISE

Climbers frequently yell to communicate during a climb. Such noise can disrupt wildlife or impact hikers adjacent to climbing areas. Other noises (e.g., rock hammers) are also considered intrusive in the wilderness setting. Climbers will be encouraged to be sensitive to the value of natural quiet. Rock hammers, when allowed, must be used judiciously during sensitive times for wildlife (e.g., breeding, nesting) and in areas where other visitors may be disturbed.

WILDLIFE

Many of the popular climbing areas in the parks are also prime habitat for sensitive species of wildlife. Birds of prey frequently nest on rocks along and adjacent to established climbing routes. Concerns exist for both birds and climber safety.

The raptor area closures program has been a very successful means to reduce impacts. This program will continue. Temporary closures will be used to protect nesting raptors during critical phases of the courtship, nesting, and fledging periods. Precautionary and usually seasonal closures will occur in areas historically used by raptors (e.g., Moro Rock and Chimney Rock). Raptor activity will be monitored and those areas or routes with current raptor use will be closed. Other areas where susceptible wildlife activity is discovered will also be closed. Closures will be in effect long enough to ensure protection and non-disturbance of the birds. Temporary closures may be enacted for other wildlife protection as necessary (e.g., bighorn sheep).

VISUAL IMPACTS / CHALK

Visual impacts associated with climbing vary with user's attitudes towards climbing and their proximity to the activity. Bright colored slings, shiny metal bolts, white chalk and the sight of climbers and ropes on an otherwise undisturbed formation can detract from the scenic purpose of wilderness and the opportunities for solitude quality of wilderness character. The use of chalk may also cause a change in pH when it comes in contact with lichens, inhibiting growth or killing the plant.

Climbers will be encouraged to use protection, slings, and other equipment that blend in with the natural surroundings. The prudent use of chalk will be allowed, with balls preferred over loose chalk. Climbers will be encouraged to be sensitive to visual and environmental impacts that could occur and make attempts to clean rock of visual intrusions as practicable.

HARDWARE / EQUIPMENT

A wide range of equipment and hardware has been developed to be used as protection and aids for climbers. Hammer-driven pitons which widened and scarred cracks have been generally replaced by removable devices, as part of clean-climbing practices. However, the exploration of steeper, more difficult face climbs has led to an increase in the placement of fixed, artificial protection (e.g., bolts) by some climbers.

The use of permanent fixed anchors (e.g., bolts) is rarely appropriate in wilderness. Removable or abandoned (semi-permanent) fixed anchors (e.g., slings with or without accompanying hardware such as carabiners) must be placed judiciously and closely managed in order to prevent the degradation of wilderness resources and character. Where anchor points are necessary for climber safety, the use of removable equipment is the overwhelming preference. Permanent fixed anchors should not be placed merely for convenience or to make an otherwise un-climbable route climbable.

PUBLIC USE OF FIXED ANCHORS

Fixed anchors consist of webbing, bolts, pitons, chains, and other devices and equipment permanently or semi-permanently attached to rocks (or other natural features) that are left in place after the activity. These are, for the purposes of this strategy, divided into two categories: 1) permanent anchors (e.g., bolts), and 2) removable or abandoned (semi-permanent) anchors (e.g., slings with or without accompanying hardware such as carabiners).

NPS Director's Order #41 (DO #41) establishes that "Authorization 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. The authorization process to be followed will be established at the park level and will be based on a consideration of resource issues (including the wilderness resource) and recreation opportunities. Authorization may be issued programmatically within the Wilderness Stewardship Plan or other activity-level plan, or specifically on a case-by-case basis, such as through a permit system." And "If unacceptable impacts are occurring in wilderness as a result of climbing, the park superintendent may deem it necessary to restrict or prohibit the placement of fixed anchors."

For the purposes of this strategy, those fixed anchors, both permanent and removable/abandoned, which are currently in place may remain.

- Permanent fixed-anchors (e.g., bolts or pitons), may be placed, or replaced by individual climbers only with prior approval (see permit system below) or in the rare case of emergency. Existing bolts may be removed by individual climbers, without prior permission, if they are deemed unusable or unsafe. The climber should then communicate details of the removal to the parks (through the Chief Ranger's Office).
- Removable (or abandoned and semi-permanent) fixed-anchors (e.g., slings, nuts, or other clean climbing hardware) may be replaced or removed by individual climbers as necessary without prior approval. New semi-permanent rappel or retreat fixed-anchors may also be placed by individual climbers without prior approval, with the strong advisory to leave only the minimum necessary slings or hardware to safely descend or retreat from wilderness climbing routes, in order to keep wilderness climbing routes as free of abandoned slings and hardware as possible. The setting up of fixed-anchors for top-roping is strongly discouraged. When replacing existing slings or hardware, it is incumbent on the individual climber to carry old equipment out of wilderness and to dispose of it properly. Climbers are also strongly encouraged to remove any unsafe/unusable equipment from wilderness for proper disposal.

New, bolt-intensive climbing routes (i.e., “sport climbs”) are not appropriate in wilderness and are expressly prohibited.

ADMINISTRATIVE USE OF FIXED ANCHORS

Per DO #41 “Proposals for the placement of fixed anchors or fixed equipment for the administrative purpose of facilitating future rescue operations must be evaluated through a MRA. [Minimum Requirement Analysis]” The parks may place and maintain permanent or removable fixed anchors for administrative and emergency purposes, but only after a MRA is completed, with the exception of emergencies. The NPS will not, as policy or practice, monitor any fixed anchors to evaluate their condition or accept any responsibility for the soundness of fixed anchors. The NPS, when it encounters them during park operations, may remove those fixed anchors deemed unsafe, unnecessary, or intrusive to wilderness.

SAFETY

Personal safety in climbing, as in all wilderness activities, remains the responsibility of the climber / wilderness user. RM #41 states, “Climbing is a “high risk” sport, and climbers are solely responsible for their own safety. Many climbing routes traverse hazardous terrain, and the National Park Service is not obligated to assess or mitigate these hazards, nor is it responsible for assessing or maintaining the safety of fixed anchors or fixed equipment. While the National Park Service has the authority to provide search and rescue services to the parks’ visitors in need of assistance, there is no legal requirement to do so. All rescue activities in wilderness will be managed to provide necessary treatment and services to the sick, injured and stranded, keeping in mind the safety and well-being of rescue personnel, the victim and the public, plus “light on the land” and “minimum requirements/tool” rescue actions.”

PATROL, EDUCATION AND ENFORCEMENT PROGRAM

Without a visible patrol and education/enforcement program, educational efforts, policies and regulations will have minimal effect. An important aspect of the patrol function is the incorporation of education, research, monitoring, and impact mitigation. Patrols are predicated on the commitment to protect the resource, educate visitors, guard against illegal activities, provide necessary assistance, and perform search and rescue functions in cases of emergencies. Patrols will focus primarily on 1) the education of visitors as to resource impact issues, minimum impact techniques and preventative search and rescue and 2) the enforcement of applicable laws and regulations when necessary and appropriate.

The parks will conduct a strong educational effort promoting minimum impact techniques and sound climbing ethics as outlined in Leave No Trace® Outdoor Skills and Ethics: Rock Climbing booklet in general, and specifically these parks’ wilderness regulations and restrictions. The parks will maintain a “Rock Climbing” page on the parks’ official website (www.nps.gov/seki), which will contain this strategy, and other climbing guidelines, rules and restrictions pertaining to climbing, as well as pertinent links to related websites. This page will also communicate any information on removal of fixed-anchors, performed by the climbing community or the parks.

Climbers are required to comply with specific regulations and should always:

- Pack out all litter and manage human waste properly (leave it cleaner than you found it)
- Use existing trails to approach climbs
- Know and respect environmentally sensitive areas (e.g., raptor closures)

- Know and abide by all regulations
- Avoid the use of all fixed anchors, as much as possible
- Request and obtain permission for placement or replacement of permanent fixed anchors
- Communicate to the parks any actions involving bolt removal, and on other issues involving the climbing environment
- Be considerate of wildlife and other users
- Share the climbing resource with others and practice and encourage clean-climbing techniques

As enforcement measures become necessary, patrol staff will enforce applicable regulations (e.g., no power drills for bolt placement, no pets in the wilderness, illegal guiding activities, violation of raptor closures, illegal camping and bivouacs, or resource degradation for the purpose of enhancing a climbing route).

RESEARCH AND MONITORING

The parks have sporadically conducted informal surveys of a small proportion of known and potential climbing areas. Given this limited information, a comprehensive inventory would be of value in assisting the proper management of climbing. It is a goal of the parks to develop and maintain an inventory and monitoring program to gather detailed information on how climbing activities affect wilderness character and resources. This inventory would be conducted prior to or in conjunction with the future development of a comprehensive climbing management plan.

SUMMIT REGISTERS

More than 170 summit (or peak) registers exist in the parks. They generally consist of a sealable weather-resistant container (metal, plastic, or glass) holding a small notebook in which people record dates and details of their climbs. The parks recognize that a limited number of summit registers is compatible with wilderness character, provided registers are in appropriate locations, of appropriate size and construction, and are well maintained. It is a desired condition of this WSP/FEIS to reduce developments and installations in wilderness; therefore, the parks will work toward reducing the number of registers and will not permit placement of new registers. In the near future, the parks will pursue the development of a general agreement (e.g., Memorandum of Understanding) between the NPS and the Sierra Peaks Section of the Sierra Club, which would determine locations, maintenance standards, and other conditions under which registers could remain.

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**ATTACHMENT 1:
APPLICATION FOR SPECIAL USE PERMIT**

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OBTAINING A PERMIT

To request permission to place a new permanent fixed anchor, or replace an existing permanent fixed anchor complete the Special Use Permit (Form 10-930) application below and submit to:

Superintendent, Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

INSTRUCTIONS

Within the permit, provide detailed information on:

- What you propose to do; place a new permanent fixed anchor, or replace an existing permanent fixed anchor.
- Where you propose to accomplish the above – provide as much detail as possible – area, route, etc.
- The description and justification of the proposed action (i.e., provide in detail, why you need to do what you are proposing. Attach any diagrams, maps, and additional pages if necessary):
- The dates of the proposed action
- Will you be accomplishing the action by yourself or with assistance of others? Please describe.

Regulations and restrictions for all wilderness users, as well as specific required conditions for permittees, include:

- Permittee will be required to comply with all wilderness regulations, including obtaining a wilderness permit (if staying overnight) and abiding by all camping restrictions and guidelines, and ensuring that other group members conduct themselves accordingly.
- The use and possession of motorized equipment (e.g., drills) is prohibited.
- The permittee is responsible for their personal safe conduct and that of other group members.

You may provide additional information and justification by attaching additional pages. You will be notified of the disposition of the application and the necessary steps to secure your final permit. Applications should be submitted at least 4 weeks before the date of the proposed action.

**National Park Service
Sequoia and Kings Canyon National Parks
47050 Generals Highway, Three Rivers, CA 93271
559-565-3111**

Application for Special Use Permit

Please supply the information requested below. **Attach additional sheets, if necessary, to provide required information.** A nonrefundable processing fee of \$20.00 must accompany this application unless the requested use is an exercise of a First Amendment right. You must allow sufficient time for the parks to process your request; check with the parks for guidelines. You will be notified of the status of the application and the necessary steps to secure your final permit. Your permit may require the payment of cost recovery charges and proof of liability insurance naming the United States of America as also insured.

Enter either a social security number OR a tax ID number: we do not require both.

Applicant Name:	Company/Organization Name:
Social Security #:	Tax ID #
Street/Address:	Street/Address:
City/State/Zip Code:	City/State/Zip Code:
Telephone #:	Contact name:
Cell phone #:	Telephone #:
Fax #:	Fax#:
Email:	Email:

Description of Proposed Activity (attach diagram, attach additional pages if necessary):

Requested Location(s): _____

Date(s):

Set up begins: (date and time)	Activity begins: (date and time)	Activity ends: (date and time)	Removal completed (date and time)

Maximum Number of Participants: _____ (Please provide best estimate)

Maximum Number of vehicles: (attach parking plan)

_____ Cars _____ Vans/lit.trucks _____ Utl.vans/trucks _____ Buses/oversized vehicles

Support equipment (list all equipment; attach additional pages if necessary):

List support personnel including addresses and telephones; attach additional pages if necessary:

Individual in charge of activity on-site (include cell phone number) and authorized to make decisions related to the permitted activity: _____

- Is this an exercise of First Amendment Rights? Y N
- Have you visited the requested area? Y N
- Have you obtained a permit from the National Park Service in the past?
(If yes, provide a list of permit dates and locations on a separate page.) Y N
- Do you plan to advertise or issue a press release before the event? Y N
- Will you distribute printed material? Y N
- Is there any reason to believe there will be attempts to disrupt, protest or prevent your event?
(If yes, please explain on a separate page.) Y N
- Do you intend to solicit donations or offer items for sale?
(These activities may require an additional permit.) Y N

You are encouraged to attach additional pages with information useful in evaluating your permit request including: staging, sound systems, parking plan, security plans, sanitary facilities, crowd control, emergency medical plan, use of any building, site clean-up, etc.

The applicant by his or her signature certifies that all the information given is complete and correct, and that no false or misleading information or statements have been given.

Signature _____ Date _____

Printed Name _____ Title _____

Note: This is an application only, and does not serve as permission to conduct any special activity in the park. The information provided will be used to determine whether a permit will be issued. Send the

completed application along with the application fee in the form of a credit card payment, cashier's check, money order or personal check made payable to **National Park Service** to:

Superintendent,
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

If your request is approved, a permit containing applicable terms and conditions will be sent you. The permit must be signed by the responsible person and returned to the parks for final approval by the Superintendent before the permitted activity may begin.

Notice to Customers Making Payment by Personal Check: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment, and you will not receive your check back from your financial institution.

NOTICES

Privacy Act Statement: The Privacy Act of 1974 (5 U.S.C. 552a) provides that you be furnished with the following information in connection with information required by this application. This information is being collected to allow the parks' manager to make a value judgment on whether or not to allow the requested use. Applicants are required to provide their social security or taxpayer identification number for activities subject to collection of fees and charges by the National Park Service (31 U.S.C. 7701). Information from the application may be transferred to appropriate Federal, State, and local agencies, when relevant to civil, criminal or regulatory investigations or prosecutions.

Paperwork Reduction Act Statement: We are collecting this information subject to the Paperwork Reduction Act (44 U.S.C. 3501) to provide the parks' managers the information needed to decide whether or not to allow the requested use. All applicable parts of the form must be completed in order for your request to be considered. You are not required to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

Estimated Burden Statement: Public reporting burden for this form is estimated to average 30 minutes per response including the time it takes to read, gather and maintain data, review instructions and complete the form. Direct comments regarding this burden estimate or any other aspect of this form to the Information Collection Clearance Officer, National Park Service, 1849 C Street NW. (1237), Washington, D.C. 20240

Title 18 U.S.C. Section 1001 makes it a crime for any person to knowingly and willfully make to any department or agency of the United States any false, fictitious, or fraudulent statements or representations as to any matter within its jurisdiction.