

DRAFT REFERENCE MANUAL 41: WILDERNESS STEWARDSHIP
Evaluation and Authorization Procedures for Fixed Anchors
and Fixed Equipment in National Park Service Wilderness

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Recommendation and Approval for Inclusion in Reference Manual 41

Recommended by the WASO Wilderness Stewardship Division:

Signature: _____

Date: _____

Title: Program Manager, Wilderness Stewardship Division

Concurrence by the National Wilderness Leadership Council:

Signature: _____

Date: _____

Title: Chair, National Wilderness Leadership Council

Approval for inclusion in Reference Manual 41 by WASO Visitor and Resource Protection:

Signature: _____

Date: _____

Title: Associate Director, Visitor and Resource Protection

SECTION 1: BACKGROUND AND PURPOSE

The National Park Service (NPS) has long recognized that climbing is an important and historically relevant recreational activity in many NPS wilderness areas. Climbing, including climbing in wilderness areas, continues to grow in popularity.

Historically and currently, specialized anchoring equipment and ropes are used while climbing to reduce the risk of a consequential fall. Anchors may be temporary and removable, or they may be permanently affixed to the climbing surface (i.e., a “fixed anchor”). The most common kind of fixed anchor is a fixed bolt, which is a type of permanent anchor that is fixed into a hole drilled in the rock. Other types of fixed anchors or fixed equipment that may be left behind after the installer leaves the wilderness include but are not limited to pitons, slings, fixed ropes, and ice screws.

Director’s Order 41 §7.2 affirms that “climbing is a legitimate and appropriate use of wilderness” and that “the occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act,” but that “the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation.” Director’s Order 41 §7.2 also states that “fixed anchors or fixed equipment should be rare in wilderness” and that ““clean climbing” techniques should be the norm in wilderness.’

This Reference Manual 41 directive clarifies that fixed anchors and fixed equipment (hereinafter referred to as “fixed anchors”) are a type of installation under §4(c) of the Wilderness Act, consistent with the definition of that term in Reference Manual 41 §3.1 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.” Fixed anchors fall into this definition because they are installed and remain in place long after the installer has left. Although fixed anchors may be small, there is no ‘de minimis’ exception to the Wilderness Act’s restriction on installations, and the combined impact of many fixed anchors in a single area or rock wall can have a significant effect on wilderness character. Therefore, fixed anchors constitute a prohibited use pursuant to the Wilderness Act §4(c) and may only be authorized if they are determined to be “necessary to meet minimum requirements for the administration of the area for the purpose of [The Wilderness Act]” through a minimum requirements analysis (MRA).

This does not mean that fixed anchors may never be authorized in NPS wilderness. As discussed further below, climbing activities can fulfill important park and wilderness recreational purposes and can help preserve wilderness character by providing opportunities for primitive and unconfined recreation. Park units where climbing is authorized in wilderness areas must therefore consider what level of fixed anchor use best preserves the totality of wilderness values through an MRA process.

This directive gives guidance for evaluating potential actions taken by park units to authorize the placement and/or replacement of fixed anchors for recreational climbing in NPS wilderness areas. Installation of fixed anchors by NPS personnel for administrative and/or operational purposes (e.g., search and rescue, research, trail projects) is also subject to NPS policies and protocols regarding the MRA process.

SECTION 2: CLIMBING MANAGEMENT

The park superintendent is responsible for the management of climbing activities within a park unit, including evaluating requests from the public to install fixed anchors in wilderness and ensuring that policies and regulations regarding fixed anchors are properly applied and enforced. In accordance with Director's Order 41 §7.2, if climbing activities occur in wilderness, climbing management strategies should be included as part of the park's Wilderness Stewardship Plan or other appropriate park planning document. These plans provide an opportunity for the park to holistically assess levels and types of climbing use and related issues and impacts, and identify desired conditions, indicators, standards, and thresholds needed to minimize adverse impacts, as well as providing an opportunity for the public to review and provide comment. 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, including the identification of special conditions, limitations, or thresholds. Depending on the circumstances, programmatic decisions in a park plan may be supported by a programmatic MRA, or the MRA process may be deferred to individual applications under the framework laid out in the plan.

The planning process also provides an opportunity for tribal consultation on climbing in wilderness areas. For Native Americans, wilderness can be a homeland or a place of profound tribal history and traditional use. Many NPS wilderness climbing areas and opportunities are located at or near culturally sensitive areas and resources (e.g., sacred sites, burial sites, cultural resources, and archeological artifacts), thus consultation with federally recognized Indian Tribes is of critical importance when managing climbing activities in NPS wilderness.

In the absence of a formal park plan that addresses wilderness climbing, park superintendents may manage wilderness climbing activities and evaluate individual requests to install or replace fixed anchors through an interim guidance or strategy or may rely on existing guidance in the park's Wilderness Stewardship Plan and other relevant park planning documents and NPS policies. In this situation, individual approvals must be subject to an MRA process. Park superintendents may also choose to restrict or prohibit new and/or replacement fixed anchors, subject to emergency replacements described in the paragraph below, until a formal planning process is completed.

Existing fixed anchors may continue to be used. Parks should evaluate all routes with existing fixed anchors when practicable, as funding and resources allow, through either a park, area, or route specific MRA. On routes that have not yet been evaluated, climbers may make emergency replacements of pre-existing fixed anchors if necessary to exit the climb in the safest and most expeditious manner possible. All other replacements must be evaluated through an MRA before being approved, though a park-specific planning process may provide more direction regarding replacement of fixed anchors. Once a route has been evaluated and approved for continued use in wilderness, replacement of existing bolts on the route may be done without a new MRA unless wilderness character conditions have changed since the initial review, or if the replacement will include the drilling of a new hole or the use of a power drill. Permit considerations are discussed further in Section 5.

SECTION 3: FIXED ANCHOR APPLICATION PROCEDURES

Regardless of whether approval is issued through a programmatic or site-specific MRA review, the park should require permit applications for specific installation or replacement requests to establish and ensure compliance with any special terms, conditions, or special provisions. Requests should be submitted in writing to the park superintendent (or their designee) via letter, email, or approved application form and must include specific details related to the climbing activity, including but not limited to the climber's name and contact information, specific location or area, approach and exit route, name of route, formation or mountain, type and quantity of fixed anchors or fixed equipment being requested, dates or time of year, etc. Whenever possible, a map and/or photograph depicting the specific access and exit route and climbing location should be included.

Note that any application form developed by the park to collect information from the public must be reviewed and approved by the Office of Management and Budget (OMB) in accordance with the [*Paperwork Reduction Act \(44 U.S.C. 3501 et seq.\)*](#). OMB approval includes the issuance of a Control Number which must be disclosed on the application form along with additional privacy and burden disclosures. The NPS *Backcountry and Wilderness Use Permit Application* (Form 10-404), approved by OMB (Control # 1024-0022), provides a means of collecting information from the public needed to evaluate a fixed anchor request (see Appendix A). Form 10-404 contains a list of approved questions that are helpful in the application process, including a reference to climbing activity and climbing equipment. If a park does not use this form, it will need to ensure compliance with the Paperwork Reduction Act.

Park units where climbing occurs in wilderness areas should ensure that fixed anchor request and application procedures are clearly posted on the park website and readily available at appropriate park locations (i.e., visitor centers, front desk, ranger stations, and permit centers). Park-specific procedures should include timelines for application submission and park review, determination, and response to the applicant.

SECTION 4: FIXED ANCHOR EVALUATION PROCEDURES (MINIMUM REQUIREMENTS ANALYSIS)

As stated above, a Minimum Requirements Analysis (MRA) is required for individual, case-by-case applications to install fixed anchors, or on a programmatic basis if desired conditions, thresholds, and decisions regarding fixed anchors are established through a climbing management plan or equivalent planning document.

An MRA is a documented, two-step process that first determines whether an action is necessary for administration of the area as wilderness, and if so, identifies the method or tool to accomplish the action with the least adverse impact on wilderness character. NPS policies regarding the MRA process are well-established in *Management Policies 2006* §6.3.5 and *Director's Order 41* §6.4 and MRAs serve as the interagency standard for wilderness compliance within the National Wilderness Preservation System.

Step 1: Step 1 of the MRA process determines whether accommodating recreational climbing opportunities is a necessary activity to administer the wilderness area. Director's Order 41 affirms that "climbing is a legitimate and appropriate use of wilderness." Step 1 should discuss how climbing fulfills park and wilderness recreational purposes and furthers wilderness values. For example, parks should consider whether climbing is identified as an important recreational activity in the unit's enabling legislation, wilderness designation, foundation document, or management plans. Parks should also consider the history of climbing at the park and how it contributes to the park's unique recreation opportunities. If appropriate, parks should consider what climbing opportunities exist outside of wilderness and whether those are sufficient to realize the recreational objectives of the park or whether some type of climbing in wilderness is necessary to fully realize the purposes of the wilderness area.

Additionally, Step 1 of the MRA process should discuss how recreational climbing preserves the qualities of wilderness character. The NPS, in coordination with the other wilderness management agencies, has defined the term "wilderness character" by identifying five specific qualities of wilderness character based on the definition of wilderness in the Wilderness Act. 16 U.S.C. §1131(c). These qualities include: (1) natural; (2) untrammeled; (3) undeveloped; (4) outstanding opportunities for solitude or a primitive and unconfined type of recreation; and (5) other features of ecological, geological, scientific, educational, scenic, or historical value (see [Keeping It Wild 2](#) and [Keeping it Wild in the NPS](#) for more information). 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.

Finally, Step 1 should also note how recreational climbing in wilderness satisfies the public purpose of “recreation” established in the [*Wilderness Act, 16 U.S.C. §1133\(b\)*](#). If the park finds that providing for recreational climbing is necessary for administering the wilderness area for wilderness purposes, then a range of alternatives to accommodate climbing activities should be analyzed in Step 2 of the MRA process.

Step 2: Step 2 considers a range of possible alternatives for different levels of fixed anchor use to accommodate recreational climbing in wilderness, including an option that considers the impacts of not authorizing any fixed anchors in wilderness or denying the specific installation application, depending on the circumstances. The analysis should be guided by the broad policy direction in Director’s Order 41 that “fixed anchors or fixed equipment should be rare” and that “clean climbing” techniques should be the norm in wilderness.” Director’s Order 41 also states that occasional fixed anchor use “does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act,” but that “the establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management.”

The analysis of alternatives should evaluate both positive and adverse impacts to the qualities of wilderness character in each of the alternatives (and associated components) to determine what level of fixed anchors best preserves the totality of wilderness character. The park should discuss the effects on different aspects of wilderness character caused by different levels of fixed anchor use, and possible trade-offs between those effects. The Step 2 analysis may also be informed by discussing how specific climbing types, methods, traditions, history, and ethics regarding climbing have evolved at the park. In addition, the following factors are important to consider when evaluating fixed anchor applications:

- 1) Fixed anchors and fixed equipment (i.e., installations) and power drills (i.e., motorized equipment) may constitute a negative impact to the *undeveloped quality* of wilderness character.
- 2) Recreational climbing can have a positive impact on the *primitive and unconfined recreation quality* of wilderness character and may also have a positive impact on the *solitude quality* of wilderness character.
- 3) Sound associated with drilling holes in the rock for the placement of fixed anchors may have a negative impact on the *solitude quality* of wilderness character.
- 4) The *other features of value quality* include features of significant importance to the culture and traditions of affiliated tribes and indigenous peoples, including but not limited to sacred and spiritual sites, burial sites, archeological artifacts, and other cultural resources.

The park should then select the level or type of fixed anchor use that best preserves the totality of wilderness character and explain the decision. If some level of fixed anchor use is authorized, the

park should specifically explain why the alternative of no fixed anchors, or denying the specific installation application, was not selected.

The park should then determine whether a specific route, which includes a suitable number of fixed anchors to address safety concerns, meets the alternative selected in the MRA and therefore qualifies as the minimum necessary in wilderness. A comprehensive outline for evaluating recreational climbing and fixed anchor applications in wilderness through an MRA process is provided in Appendix B.

SECTION 5: FIXED ANCHOR AUTHORIZATION PROCEDURES

If a specific application to install a fixed anchor is approved through either a programmatic or a site-specific MRA, then the park should issue a permit to authorize the installation activity and set appropriate terms and conditions. Permits may be issued under the authority of 36 CFR § 1.5(a)(2) for installing a fixed anchor, which authorizes the superintendent to designate areas for a specific use or activity, or impose conditions or restrictions on a use or activity, and under the authority of 36 CFR § 2.22(a)(2) for leaving a fixed anchor in the rock, which authorizes the superintendent to designate locations and circumstances where property may be left unattended for longer than 24 hours. The requirement to obtain a fixed anchor permit should be established in the Superintendent's Compendium. The following template language is recommended but may be altered to meet the park's specific needs:

36 CFR §§ 1.5(a)(2) Closures and Public Use Limits and 2.22(a)(2) Property. A permit is required to authorize the placement of permanent fixed anchors and/or fixed equipment for the purpose of facilitating recreational climbing in park wilderness areas.

Justification: NPS wilderness stewardship policies require that permanent fixed anchors and fixed equipment must be authorized prior to placement in NPS wilderness areas. Permits are an effective management tool that provide a means to monitor the effects of fixed anchors and equipment on wilderness character and help ensure that authorized fixed anchors and fixed equipment are not considered abandoned property and therefore removed and impounded.

Those who wish to obtain a permit must contact the park and complete the Backcountry and Wilderness Use Application Form 10-404 (Fixed Anchors). If approved, the placement of permanent fixed anchors and/or fixed equipment will be authorized through the issuance of a Backcountry and Wilderness Use Permit and be subject to the terms and conditions of that permit. See [park website] for further information on application procedures.

Fixed anchor permits should include specific terms, conditions, and special provisions to ensure the protection of park resources and visitors and the preservation of wilderness character, including but not limited to the number, type, and color of fixed anchors, the specific installation

dates, and location of the climbing route where the authorization is applicable, and any temporal restrictions. It is also highly recommended that the permittee be required to provide a post-climb report regarding the number and location of fixed anchors that were installed. The Backcountry and Wilderness Use (Fixed Anchors & Fixed Equipment) Permit is provided in Appendix C.

SECTION 6: LIABILITY CONSIDERATIONS

As a general matter, the NPS should seek to manage wilderness areas with reasonable care, including identifying hazards that pose a danger to visitors. In the case of climbing, fixed anchors may, for various reasons, pose a safety risk that the NPS cannot always mitigate. In locations where fixed anchors may pose a safety risk, the NPS should attempt to communicate this risk to the public and seek ways to mitigate it, including replacing or removing potentially hazardous anchors.

The following actions and measures should be considered to mitigate risk related to fixed anchors:

- Develop a climbing management plan that includes a practical and reasonable plan for review and management of fixed anchors.
- Warnings or advisories that the NPS does not install climbing bolts and users should confirm any bolt's fitness for use before using it are highly recommended. Appropriate locations include website, any distributed printed material relating to climbing, at trailheads, or communication signs inside the park near climbing areas.
- Where periodic inspection by NPS staff is not practical, consider other methods such as implementing a climber reporting system for potentially problematic fixed anchors. This method would ideally include a plan for documenting resolution of reports. Where periodic inspection by NPS staff is not practical, consider other methods such as implementing a climber reporting system for potentially problematic fixed anchors. This method would ideally include a plan for documenting resolution of reports.
- When appropriate, implement temporary or permanent closures of climbing routes or areas, or approve a reroute of a particular climbing route.
- Work with climbing groups or individual climbers to replace or remove fixed anchors.
- Use climbing groups or individual climbers through the Volunteer in Parks Program to help monitor and manage fixed anchors.
- Use GIS technology to document locations and manage fixed anchors.

**APPENDIX A:
BACKCOUNTRY AND WILDERNESS USE PERMIT APPLICATION
(FIXED ANCHORS AND FIXED EQUIPMENT)**

NPS Form 10-404 (Rev. 04/2021)
National Park Service

OMB Control No: 1024-0022

Park Name:

Park Office:

Park Address:

Park Telephone Number:

[NOTE TO PARKS: *The fields in the “Applicant Information Section” below and records retention statement in the footer are mandatory for every park to show on their form.* You may not change any fields in the list or add any fields to the list. Changes or additions must be approved by OMB through the Bureau Information Collection Clearance Officer, Phadrea Ponds [970-267-7213].

APPLICANT INFORMATION (all fields in this section are mandatory)

Name:

Address (city, state/province/postal code):

Telephone Number (home or cell):

FAX Number:

Email Address:

TYPE OF BACKCOUNTRY AND WILDERNESS USE (check all that apply)

Rock climbing

Bouldering

Mountaineering

Mountain climbing

Canyoneering

Highlining

Slacklining

Other:

ITINERARY DETAILS (complete all that apply)

Entry location and date:

Exit location and date:

Access trail or route:

Egress trail or route:

Climbing route, formation, face:

Mountain or summit:

GPS coordinates:

Location/route map, sketch, or photo:

HARDWARE & EQUIPMENT SUBJECT TO PERMIT (check all that apply)

Bolts (quantity):

Snow pickets (quantity):

Pitons (quantity):

Ladders

Fixed ropes or lines (length):

Power drill

Slings (quantity):

Hand drill

Ice screws (quantity):

Other:

OTHER INFORMATION

Vehicle information (make, state/province, registration #):

Personal locator or signal device (type and service provider):

Satellite phone or communications device (type and service provider):

NOTICES

Privacy Act Statement

General: This information is provided pursuant to Public Law 93-579 (Privacy Act of 1974), December 21, 1984, for individuals completing this form.

Authority: 54 U.S.C. §100101, NPS Organic Act; 16 U.S.C. 1131-1136, Wilderness Act; 43 U.S.C. §1701 et seq., 16 U.S.C. §6801-6814, the Federal Lands Recreation Enhancement Act; 36 CFR Part 71, Recreation Fees; 36 CFR §1.5 Closures and public use limits, 36 CFR §1.6 Permits; and 36 CFR §2.22 Property.

Paperwork Reduction Act Statement: We are collecting this information subject to the Paperwork Reduction Act (44 U.S.C. 3501) and 36 CFR §1.6 (Permits), which authorize the National Park Service to require applicants to fill out this form to monitor resources and to protect visitors. The purpose of this application is to establish and verify an applicant's eligibility for a permit to conduct recreational climbing involving the placement of fixed anchors or fixed equipment within the National Park Service wilderness areas and to process permits for individual members of the public and organizations interested in obtaining a permit authorizing an activity. All applicable parts of the form must be completed 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. Public Reporting burden for this form is estimated to average 8 minutes per response, including the time it takes for reviewing instructions, gathering, and maintaining data, and completing and reviewing the form. Comments regarding this burden estimate or any aspect of this form should be sent to the Information Collection Clearance Officer, National Park Service, 12201 Sunrise Valley Drive, Reston VA 20192. Do not send this application to this address but rather to the park address listed at the top of the first page.

**APPENDIX B:
MINIMUM REQUIREMENTS ANALYSIS OUTLINE**

STEP 1: IS ADMINISTRATIVE ACTION NECESSARY?

Issue Description: The description should explain in general terms the issue that may require some action in wilderness. The issue may be a problem, situation, opportunity, or other circumstance that requires consideration. It is not a proposed action, tool, or solution. The description should neither assume action will be taken nor identify a specific method. Moreover, the description should not attempt to justify the placement of an installation, use of motorized equipment or mechanical transport or other prohibited use in wilderness. Instead, the statement of the existing issue should identify what is occurring in the wilderness so that the rest of the analysis in Step 1 can determine whether action may be necessary in wilderness.

Describe how the issue relates to recreational climbing in wilderness and provide additional details related to a request or application to install fixed anchors or fixed equipment in wilderness. If applicable, cite any pertinent policies or management direction (including those derived from NEPA environmental compliance decision documents).

Options Outside of Wilderness: *Can the issue be resolved or addressed outside of wilderness? If yes, explain and do not act. If no, explain and proceed to next section.*

Important consideration: If appropriate, discuss what climbing opportunities exist outside of wilderness and whether those are sufficient to realize the recreational objectives of the park or whether some type of climbing in wilderness is necessary to fully realize the purposes of the wilderness area.

Criteria for Determining Necessity: *Do any of the criteria below apply?*

A. Wilderness Character: *Based on the Issue Statement, would any of the qualities of wilderness character (untrammled, undeveloped, natural, solitude or primitive and unconfined recreation, other features of value) be preserved by taking or evaluating further action? Answer yes or no for each quality and explain.*

- **Untrammled Quality:** *Recreational climbing typically does not preserve the Untrammled Quality. Cite any exceptions based on the issue.*
- **Undeveloped Quality:** *Recreational climbing typically does not preserve the Undeveloped Quality. Cite any exceptions based on the issue.*

- **Natural Quality:** *Recreational climbing typically does not preserve the Natural Quality. Cite any exceptions based on the issue.*
- **Solitude or Primitive and Unconfirmed Recreation Quality:** *Climbing is a wilderness-appropriate activity that connects people with the land, builds self-reliance, presents challenge, and requires skill. These values are generally consistent with preserving opportunities for primitive and unconfined recreation in NPS wilderness. Explain how allowing for climbing opportunities in wilderness preserves this quality of wilderness character.*
- **Other Features of Value Quality:** *Recreational climbing typically does not preserve the Other Features of Value Quality, although it's possible that a particular climbing route may have historic significance. Cite any exceptions based on the issue.*

B. Valid Existing Rights: *Valid existing rights typically would not apply to issues related to recreational climbing. Cite any exceptions based on the issue.*

C. Special Provisions of Wilderness Legislation

Is action necessary to satisfy a special provision in wilderness legislation (i.e., Section 4(d) of the Wilderness Act of 1964 or subsequent wilderness enabling laws) that requires action? If yes, cite law, section, and special provision. In addition, cite how recreational climbing satisfies the public purpose of recreation established in the [Wilderness Act, 16 U.S.C. §1133\(b\)](#). Cite reference if applicable.

D. Requirements of Other Federal Laws or Legal Directives

Not including special provisions found in wilderness-enabling laws, does another Federal law or legal directive (e.g., Park enabling legislation, treaty, executive order, secretarial order, court order, or other legally binding agreement with federal, state, tribal, or local agencies or authorities) require action? Cite law or directive and section if applicable.

STEP ONE: DETERMINATION – IS ADMINISTRATIVE ACTION NECESSARY

Provide a thorough explanation of the rationale described in Section A. through D above and if at least one quality of wilderness character is preserved, and/or at least one criterion in B through D is met, then further action can be deemed necessary, and the analysis should proceed to Step 2. If none of the criteria have been met, explain why the issue does not meet the criteria, and stop your analysis.

The following considerations are typically applicable to a Step One determination related to recreational climbing in wilderness:

- *Climbing is an appropriate recreational use in wilderness because accommodating the use may have a positive effect on wilderness character, provided the use of fixed anchors to provide for the use is managed appropriately and in accordance with NPS wilderness climbing policies.*
- *The NPS, in coordination with the other wilderness management agencies, has defined the term “wilderness character” by identifying five specific qualities of wilderness character based on the definition of wilderness contained in the Wilderness Act. 16 U.S.C. §1131(c). These qualities include: (1) natural; (2) untrammeled; (3) undeveloped; (4) outstanding opportunities for solitude or a primitive and unconfined type of recreation; and (5) other features of ecological, geological, scientific, educational, scenic, or historical value. (See [Keeping It Wild 2](#) and [Keeping it Wild in the NPS](#)).*
- *Under this framework, a §4(c) action that has a positive effect to the qualities of wilderness character may be deemed “necessary for minimum requirements of administration of the area for the purpose” of the Act because it furthers the statutory mandate to preserve wilderness character. Applying this analysis issues related to recreational climbing in wilderness, some amount of wilderness-appropriate climbing activity can preserve wilderness character because it contributes to the “opportunities for solitude or a primitive and unconfined type of recreation” quality of wilderness character, even if it has some adverse impact to the “undeveloped” quality of wilderness character.*

Based on these considerations, determine whether there is adequate rationale to evaluate a range of action alternatives in Step 2, including at least one alternative that further analyzes the placement of fixed anchors.

STEP 2: DETERMINE THE MINIMUM ACTIVITY

Other Direction: Is there “special provisions” language in legislation (or other congressional direction) that explicitly considers (but does not require) a prohibited use? (Step 1 has a similar question in Section C, but that question is specific to other legislation requiring action in wilderness, while this question is specific to other legislation addressing consideration of prohibited uses).

AND/OR: Has the issue (i.e., recreational climbing) been specifically addressed or prescribed in one or more of the following: NPS policy, superintendent’s compendium, climbing management plan, wilderness stewardship plan, standards that have evolved for the use and preservation of the park, wilderness character narrative, wilderness character change or trend reports, general management plan, foundation document, legal directive, or other binding agreement with federal, state, or local agencies or authorities)? Describe if applicable.

Please note the following wilderness climbing polices established in Director’s Order 41 7. (2013 are extremely important considerations in the Step 2 process.

- *The NPS recognized that climbing is a legitimate and appropriate use of wilderness.*
- *Any climbing use or related activity must be restricted or prohibited when its occurrence, continuation, or expansion would result in unacceptable impacts to the wilderness resource or character, or interfere significantly with the experience of other park visitors*
- *The occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act.*
- *Climbing practices with the least negative impact on wilderness resources will always be the preferred choice.*
- *The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support.*
- *Fixed anchors or fixed equipment should be rare in wilderness.*

The Step 2 process may also be informed by discussing how climbing relates to the history and traditions of recreational use and enjoyment of the park, and the climbing types, methods, traditions, and ethics that have evolved at the park. Describe if applicable.

Uncontrollable Timing Requirements: *What, if any, are the considerations that would dictate timing of the action?*

Workflow Components: *What are the distinct components or phases of the action? Examples of components related to climbing opportunities include but are not limited to: Access (ingress) to the climbing area, ascent of the climbing route, descent off the climbing route, exit (egress) from the climbing area.*

STEP 2: ALTERNATIVES

Establish Alternatives: *Only include feasible alternatives in this section. Some alternatives that are not feasible may warrant documentation in the “Alternatives Considered but Dismissed” section to provide a brief description and explanation of why it was dismissed and not considered in detail. A “no action” or “no installations” alternative is strongly recommended, as further analysis of action alternatives in Step 2 may result in a finding of unacceptable impacts to one or more of the qualities of wilderness character.*

Describe Alternatives: *What are the details of each alternative? When, where, and how will the action occur? What mitigation measures will be taken? Provide a complete narrative description*

of the Component Methods identified above. How will each of the components of the action be performed under each alternative?

Wilderness Character: *What is the effect (positive and negative) of each component method on each of the qualities of wilderness character? Consider changes, trends and cumulative impacts in each quality identified through wilderness character monitoring programs and other forms of inventory, monitoring, and documentation. What mitigation measures will be taken?*

Untrammelled: *Explain the positive and negative effects from actions that would intentionally control, manipulate, or hinder the conditions or processes of ecological systems.*

Undeveloped: *Explain the positive and negative effects to this quality in terms of how “the imprint of man’s work [would] remain substantially unnoticeable” and how wilderness will continue to contrast with other areas of “growing mechanization. Important note: Fixed anchors and fixed equipment (i.e., installations) and power drills (i.e., motorized equipment) would constitute a negative impact on the undeveloped quality. The quantity, density, and distribution of existing fixed anchors and fixed equipment is also a significant factor.*

Natural: *Explain the positive and negative effects to this quality in terms of protection, degradation, or restoration of natural conditions. Important note: Indicators for the natural quality include plants, animals, air and water, and ecological processes.*

Solitude or Primitive and Unconfined Recreation: *Explain the positive and negative effects on opportunities for visitors to experience solitude or a primitive and unconfined type of recreation. As appropriate, describe solitude, primitive recreation, and unconfined recreation separately.*

Other Features of Value: *Explain the positive and negative effects to features that are of scientific, educational, scenic, or historical value that are not accounted for in the above qualities, including cultural and paleontological resources that are integral to wilderness character. Important note: This quality includes features of significant importance to a variety of user groups, including historical and indigenous use, sacred and spiritual sites, burial areas, archeological artifacts, and other cultural resources.*

Alternatives Considered but Dismissed: *What alternatives were considered but dismissed? Why were they dismissed?*

STEP 2: DETERMINATION – WHAT IS THE MINIMUM ACTIVITY?

Selected Alternative or combined components of different alternatives: *Identify the selected alternative (or components of different alternatives) and explaining the rationale for the selection.*

Selected Alternative: *Identify and explain rationale for selection, including a comparison of the selected alternative with other alternatives:*

Prohibited Uses: *Identify which of the prohibited uses found in §4(c) of the Wilderness Act are approved in the selected alternative? Describe limits on quantity, timing, frequency, or duration.*

Mitigation Measures, Monitoring & Reporting Requirements: *Describe if appropriate:*

STEP 2: REVIEW AND APPROVAL

Name of Project: *Insert*

Review and Approval dates and Signatures: *Insert*

**APPENDIX C:
BACKCOUNTRY AND WILDERNESS USE PERMIT
(FIXED ANCHORS AND FIXED EQUIPMENT)**

**NPS Form 10-404 (Rev. 04/2021)
National Park Service**

OMB Control No: 1024-0022

(Front of Permit)

**U.S DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE
BACKCOUNTRY AND WILDERNESS USE PERMIT
AUTHORIZING THE INSTALLATION OF FIXED ANCHORS OR FIXED EQUIPMENT
IN NATIONAL PARK SERVICE WILDERNESS**

Permission is hereby granted to [redacted]
who resides at [insert full address]
is authorized to install [insert type and number of fixed anchors or fixed equipment]
on [insert specific name of climbing route, formation, mountain, or area]
during the period of [redacted].

This permit is subject to the general provisions and any special conditions stated on the reverse hereof.

Issued at [insert name of park or unit] on the [redacted] day of [redacted], 20[redacted].

Approval official name: [insert name and title]

Approval official signature: [insert here]

I, [redacted] the permittee named herein, accept this permit subject to the terms, conditions, or obligations expressed or implied.

Name: [insert]

Address: [insert]

(Reverse of Permit)

TERMS, CONDITIONS AND SPECIAL PROVISIONS OF THIS PERMIT

1. Permittee shall exercise this authorization subject to the supervision of the Superintendent of [insert name of park or unit] and shall comply with the laws and regulations governing the administration of the National Park Service and the Park.
2. Failure to comply with any law or any regulation governing the administration of the National Park Service and the Park, or with the terms, conditions, and special provisions imposed by this permit, will be grounds for revocation of this permit.
3. This permit may not be transferred or assigned to another person without the consent, in writing of the Park Superintendent.
4. The following terms, conditions and special provisions are made a part of this permit: [insert]