



Protect America's Climbing

Written Testimony of Access Fund

Before the U.S. House Committee on Natural Resources, Subcommittee on Federal Lands Oversight Hearing on Implementation of the EXPLORE Act (America250), including the Protecting America's Rock Climbing Act (PARC Act)

Chair, Ranking Member, and Members of the Subcommittee: thank you for the opportunity to submit testimony regarding implementation of the Expanding Public Lands Outdoor Recreation Experiences (EXPLORE) Act—particularly Title I, Section 122, the Protecting America's Rock Climbing Act (PARC Act). Access Fund is the national advocacy organization and land trust for climbers. We work with land managers and local partners to protect climbing access, advance responsible stewardship, and support sustainable management in places where climbing occurs—including designated Wilderness. This testimony focuses on three implementation needs that will determine whether PARC delivers on the clear intent of Congress: 1) timely issuance of updated federal land agency guidance recognizing fixed anchors as an appropriate (i.e., not prohibited) use in Wilderness; 2) immediate steps to prevent unsafe delays in fixed-anchor maintenance and climbing management planning while guidance is developed; and 3) sufficient staffing, funding, and structured stakeholder engagement to implement the law consistently across agencies and field units.

PARC Resolves Uncertainty on Wilderness Fixed Anchors

For decades, climbing has been managed as a lawful and appropriate recreational use across federal lands—including Wilderness—under frameworks that protect wilderness character, natural and cultural resources, and visitor safety. The core issue PARC addresses is the recurring—and disruptive—uncertainty over whether climbing fixed anchors (bolts, pitons, slings and similar devices, along with associated hardware) are “installations” prohibited by the Wilderness Act. Fixed anchors are critical tools for a climber's safety system. For context, there are tens of thousands of established wilderness climbing routes across 28 states, many of which rely on fixed anchors for safe ascent and descent. That uncertainty has caused inconsistent outcomes across units and agencies, delayed climbing management plans, and created serious operational barriers to routine replacement of aging anchors on established routes.

Congress enacted PARC to settle that uncertainty and to direct a consistent, workable national approach. The enacted text requires the Secretary concerned to issue climbing management guidance on covered federal lands, and—critically for Wilderness—directs that this guidance must recognize that recreational climbing, including the use, placement, and maintenance of fixed anchors, is an appropriate use in Wilderness (when consistent with applicable law and subject to reasonable terms and conditions). This aligns with the long history of climbing management under policies that regulate fixed anchors through thoughtful authorization and resource-protection measures rather than treating them as categorically prohibited.

PARC's intent is also reinforced by bipartisan congressional oversight. In an August 2024 bipartisan Senate letter (attached to this testimony), Senators emphasized that fixed anchors are fundamental safety tools for climbers and should not be treated as prohibited "installations" in Wilderness. That bipartisan clarity matters because, without it, field units too often default to the most restrictive interpretation—creating delay, inconsistency, and avoidable conflict rather than durable management.

PARC Implementation: Delays Threaten Plans and Safety

PARC's effectiveness will be measured on the ground: whether land managers can promptly approve or allow routine maintenance of existing fixed anchors on established routes, and whether planning processes can proceed without getting delayed by legal disagreements that Congress has now answered. Access Fund is already seeing consequences from delayed or unclear policy—particularly in National Park Service units where climbing management planning and fixed-anchor maintenance have become entangled with ad hoc procedures and staffing constraints.

Joshua Tree National Park illustrates why clear PARC implementation is urgent. In recent months, climbers and partner organizations have reported that routine fixed-anchor replacement in Wilderness is increasingly treated as a permit-intensive action, with site-by-site "compliance" reviews and additional screening steps applied even when replacement is proposed on long-established routes that have been managed as appropriate recreation opportunities for decades. These processes appear to rely on informal evaluative tools that are not anchored in a finalized climbing management plan and, in practice, can reflect an underlying premise that fixed anchors are presumptively prohibited in Wilderness—an approach that is inconsistent with Congress's direction in PARC. The consequence is delay and, in some instances, denial of straightforward replacement requests, leaving aging hardware in place on established routes and creating avoidable safety hazards for the climbing public and guided clients.

These are not theoretical concerns. Fixed anchors degrade over time and require routine replacement to protect public safety—especially on established routes that see high visitation and are frequently used by guides and visiting climbers. In prior written testimony submitted to this Committee by the Access Fund and the American Mountain Guides Association (AMGA), both organizations explained that uncertainty and barriers to routine anchor maintenance can increase safety risks for climbers and guided clients and can place additional demands on search-and-rescue resources. PARC was enacted to prevent exactly this kind of paralysis and to enable land managers to focus on how to manage climbing sustainably—through clear standards and resource protections—rather than repeatedly relitigating whether baseline safety equipment is lawful in the first place.

For these reasons, Access Fund urges the Subcommittee to emphasize, in its oversight record, that agencies should treat PARC implementation as time-sensitive public safety and management infrastructure—not as a discretionary policy project. While national guidance is being drafted, agencies should issue interim field direction that 1) prevents categorical denials of routine maintenance on existing routes, 2) clarifies a clear path for timely replacement of aging anchors consistent with resource protection, and 3) avoids making site-level fixed anchor maintenance contingent on protracted, duplicative processes that effectively override Congress's intent.

Staffing Cuts Undercut PARC’s Safety and Stewardship Goals

Even the best statutory direction will fail if agencies lack the personnel to write guidance, coordinate across bureaus, take and respond to public input, train field units, and process authorizations efficiently. Staffing shortfalls are now a widely documented constraint across public land agencies. Reporting over the last year has described significant staffing losses and operational impacts in federal land management agencies, including the National Park Service and the U.S. Forest Service. National and field-level capacity matters for PARC because the law requires coordinated guidance development, public engagement, and consistent implementation—work that is staff-intensive and requires expertise in wilderness management, recreation, cultural resources, NEPA compliance, and public safety.

Joshua Tree national park also illustrates how staffing constraints translate directly into on-the-ground outcomes. When key positions—such as cultural resources staff needed to complete required review steps—are vacant and cannot be backfilled due to hiring restrictions, parks may be unable to process even routine requests to replace aging anchors on established climbing routes. The predictable result is a slowdown or suspension of maintenance authorizations, which is the opposite of what PARC was intended to address. This is why Congress’s recognition of fixed anchors as an appropriate Wilderness use must be paired with staffing sufficient to develop guidance, complete necessary reviews, and process requests promptly and consistently across units.

Overcoming Implementation Barriers: Working Group and Guidance

Access Fund urges Congress and the agencies to anticipate and remove predictable barriers that could otherwise reduce PARC’s effectiveness:

1. **Delay in national guidance and inconsistent interim practice.** Without near-term interim direction, field units may continue applying inconsistent “stop-gap” policies that treat maintenance as extraordinary, require case-by-case processes that function as de facto prohibitions, or rely on decision tools not anchored in final plans or congressional direction.
2. **Overly burdensome procedures for routine replacement on existing routes.** Routine replacement of aging hardware on established routes is a small, highly targeted action with significant safety benefit. PARC is designed to preserve “continued use and maintenance” of existing routes and fixed anchors (established prior to January 3, 2025); implementation should reflect that by providing predictable, timely pathways for maintenance while protecting resources.
3. **Lack of consistent training and templates.** Even after guidance is issued, implementation will vary unless agencies provide standardized templates, training, and coordination across regions and bureaus.

To address these barriers, Access Fund recommends that the agencies establish a federal interagency PARC Implementation Team to produce timely, consistent guidance across bureaus, supported by a transparent, non-consensus stakeholder input process that solicits perspectives without creating a standing advisory committee. The recommended approach includes:

- **Interagency PARC Implementation Team (federal-only):** NPS, USFS, BLM, and other covered bureaus coordinate to draft implementation guidance, align terminology and definitions, and develop consistent tools, templates, and training materials for field application.
- **Structured stakeholder input (open, expandable, non-consensus):** Agencies convene public listening sessions and conduct targeted stakeholder interviews with climbing organizations, guide/outfitter representatives, conservation partners, Tribes, gateway communities, and other interested parties to collect individual perspectives and factual information. This input process should avoid fixed membership, voting, or consensus recommendations, and should remain open to additional participants as implementation issues emerge.
- **Deliverables and timelines:**
 1. **Interim field guidance** issued promptly to prevent unsafe delays and promote consistent near-term implementation;
 2. **Draft national guidance** released on a defined timeline for public review, accompanied by clear implementation tools and an accessible summary of key questions; and
 3. **Final national guidance** paired with training materials, implementation templates, and field-ready checklists to support consistent application across units.

PARC implementation depends on transparency and public confidence. A structured process that enables meaningful, broad-based input—paired with a clear public review step—will improve the quality and durability of the guidance, reduce conflict, and accelerate implementation. This approach also aligns with the collaborative history of climbing management and stewardship, including the long-standing role of volunteer anchor replacement programs and local partnerships that help agencies meet safety and resource-protection objectives.

Conclusion

Congress enacted PARC to resolve uncertainty, protect climber safety, and allow land managers to manage climbing in Wilderness through practical, consistent policy rather than ad hoc disputes over legality. The Subcommittee can ensure PARC succeeds by pressing for 1) prompt issuance of national guidance recognizing fixed anchors as an appropriate Wilderness use as Congress directed; 2) interim direction that prevents unsafe delays in maintenance and planning while guidance is developed; 3) a structured interagency working group with stakeholder input and clear deliverables; and 4) and staffing sufficient to implement the law on schedule and in the field.

Access Fund stands ready to support the agencies and Congress with technical expertise, stewardship partnerships, and on-the-ground experience to ensure PARC’s promise becomes durable, effective management for America’s public lands and the climbing public.