



Protect America's Climbing

November 15, 2016

Jefferson County Open Space
100 Jefferson County Parkway
Golden, Colorado 80419
Submitted Via Email: climbing@co.jefferson.co.us

RE: Jefferson County Open Space Climbing Management Guidelines

Jefferson County Open Space:

The Access Fund appreciates this opportunity to comment on Jefferson County Open Space's current 2016 Climbing Management Guidelines. Jefferson County (JeffCo) offers a range of popular rock climbing opportunities, including Clear Creek Canyon, North Table Mountain, Windy Saddle Park, Mt. Lindo, and Cathedral Spires. The Access Fund values our relationship with JeffCo and the efforts being made to manage climbing resources within the county. JeffCo has made a significant effort to include and incorporate the climbing community into managing rock climbing in the County. Access Fund offers these comments and recommendations with the intention of improving the current 2016 Climbing Management Guidelines by presenting the needs, use patterns and concerns of the greater climbing community and proposing effective and appropriate management policies that will assist JeffCo planners.

Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 13,000 members and 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, policy and educational outreach. For more see www.accessfund.org.

Overview

In January 2016 JeffCo released updated [Climbing Management Guidelines](#) (CMG). The updated 2016 CMG added significant new regulations to climbing management in JeffCo. The focus of the additional regulations were fixed anchor management. JeffCo had cited concerns about issues related to fixed anchors including, safety, erosion, wildlife, inventory and monitoring.¹ To address the aforementioned concerns, the CMG established a fixed anchor permit process. The new permit

¹ Jefferson County Open Space Climbing Management-Fixed Hardware FAQs, 2015.

process necessitates the submission of an application for any activity associated with changes to fixed anchors: placing new fixed anchors, replacing fixed anchors, removing fixed anchors. In addition, the CMG established a new process for evaluating fixed anchor applications.² JeffCo has announced a public meeting on November 16, 2016 to revisit the current CMG and obtain public comment from climbers on the CMG and discuss updates. Prior to this meeting Access Fund has conducted local climber outreach, along with the newly formed Foothills Climbing Coalition (FHCC). Access Fund and FHCC would like to comment on two topics: 1) categories/activities that necessitate fixed anchor permits, 2) the fixed anchor permit review and permitting process.

Comments

The Access Fund believes the current CMG can be improved in the following ways. First, bolts need to be replaced when unsafe; simple fixed anchor maintenance and replacement should be allowed for existing fixed anchors without an obstructive or extensive permitting process. Second, JeffCo should continue to work towards developing a programmatic approach to route development, creating zones based on the natural resources and current level of use. The implementation of programmatic approval would limit permit requirements for new fixed anchors in certain zones.

Fixed Anchors Activities

Fixed anchors play an essential and integral role in climbing. Our position³ on fixed anchors directs the following analysis and recommendations for activities associated with fixed anchors addressed in the CMG. The CMG states permits be required for:

- Installing fixed hardware (bolts, anchors, etc.)
- Replacing or removing fixed hardware

We recommend changes to the following climbing activities that require permits, as currently listed in the CMG.

Replacing fixed anchors: Access Fund advocates for swift, unobstructed fixed anchor maintenance. The CMG states that fixed anchor replacement permits be submitted directly to JeffCo for review. This process significantly delays fixed anchor maintenance, an activity that often needs to be conducted in the moment. JeffCo should manage replacing fixed anchors based on their management objective to “manage the use of fixed-protection so as not to adversely affect the quality of the rock resource, the safety of the climbing community, the recreational experience of future climbers.”⁴ JeffCo is interested in creating an on-going record and inventory of fixed anchors placed and replaced,⁵ and although the proposed permitting process could achieve that goal, it also impedes important fixed anchor maintenance. Access Fund proposes a self-reporting process for fixed anchor maintenance activities (e.g., through www.mountainproject.com, a local climbing

² Climbing Management Guidelines-Management Strategies for Rock Climbing and Slack Lining, Jefferson County Open Space, Colorado, January, 2016.

³ Access Fund’s position on fixed anchor management. https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf

⁴ Climbing Management Guidelines <http://jeffco.us/open-space/activities/climbing/management-guide/>.

⁵ Jefferson County Open Space Climbing Management-Fixed Hardware FAQs, 2015.

organization or even JeffCo) that would not restrict fixed anchor replacement opportunities by imposing an unnecessary permit process. To ensure proper hardware and replacement technique is being implemented, pre-approved individuals could be authorized programmatically to replace hardware without JeffCo needing to administer individual permits but with the understanding that hardware replaced will be reported back to the county.

Removing fixed anchors: Access Fund believes that climbers should bear the responsibility for deciding whether to remove fixed anchors. However, if JeffCo determines that a fixed anchor needs to be removed, based on well substantiated impacts to natural or historical resources the decision should be noticed to the public.

JeffCo's decisions to remove fixed anchors should be based on JeffCo's management standards;

- Practice responsible management of our human, natural, historical, park and financial resources.
- Provide quality experiences for our customers, visitors, participants, staff and volunteers.
- Exchange information and foster collaboration to produce the best possible results.⁶

Fixed anchor management alternatives should be evaluated before any decisions are made to remove fixed anchors. All administrative changes to the condition of fixed anchors (e.g., removal) should be well-publicized to help mitigate potential negative impacts to climber safety.

Fixed Anchor Permit Review and permitting process

JeffCo's CMG outlines a fixed anchor permit review process that involves five steps: 1) application submission, 2) Fixed Hardware Review Committee (FHRC - 5 JeffCo elected volunteer citizens) review, 3) JeffCo Natural Resources and Trails assessment, 4) JeffCo staff climbing committee review, and 5) notification of determination to applicant.⁷ This section addresses the fixed anchor review committee framework.

Access Fund believes that a FHRC comprised of members in the local climbing community should continue to provide the initial review of fixed anchor permit applications. This process reduces the administrative burden on JeffCo while bringing an important degree of self-regulation and oversight among the climbing community.

To address the specific needs and concerns of JeffCo, a combination of two permitting types should be considered, using a zone management strategy for developed and undeveloped areas. We suggest individual route permits as necessary; for example, for new, undeveloped crags in Clear Creek Canyon. This would allow JeffCo to conduct an initial assessment of trail needs and other potential resource impacts.

In areas already developed for climbing, we propose that individual route permits not be required. Instead route developers would complete a bolt placement certification process that ensures first ascensionists are educated on JeffCo's regulations. An example of programmatic permitting of

⁶ About Jefferson County Open Space <http://jeffco.us/open-space/about/>.

⁷ Fixed Hardware Review Committee, Code of Conduct, Jefferson County Open Space, Colorado, October 2015.

individuals being implemented can be found at Castle Rocks State Park in Idaho.⁸ Developers commit to self-reporting of new route development for inventory purposes after receiving an orientation certificate. Additional options for self-reporting programs include inventories managed by www.mountainproject.com, a local climbing organization or JeffCo.

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The Access Fund appreciates this opportunity to comment on Jefferson County Open Space's current 2016 CMP. We presented comments and changes to two categories: 1) the activities that necessitate fixed anchor permits, 2) the fixed anchor permit review and permitting process. We believe that swift fixed anchor maintenance and replacement must be allowed for existing fixed anchors, new anchor permits should be required only for undeveloped crags and specific areas with sensitive natural resources.

We acknowledge the time and effort JeffCo has put into developing this CMG and working with the climbing community. Our comments and suggestions are aimed to help develop sustainable climbing management guidelines that include the tailored management of climbing resources throughout the county and provide a safe climbing experience while limiting the burden to the stakeholder. We greatly appreciate the time the JeffCo staff dedicated to attending our latest National Climbing Advocate Summit in October 2016 and we look forward to continuing to work with JeffCo, and value your careful consideration of our comments on the current 2016 CMG.

Sincerely,



Katie Goodwin
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cc:

Brady Robinson, Access Fund Executive Director

Erik Murdock, Access Fund Policy Director

Doug Redosh, FHCC Vice President

⁸ See <http://www.nps.gov/ciro/learn/management/upload/Castle-Rocks-Climbing-Management-Plan-2003.pdf>.