



Protect America's Climbing

May 25, 2017

Monument Review, MS-1530, U.S.  
Department of the Interior, 1849 C Street  
NW, Washington, DC 20240

**RE: Access Fund Support for Process Leading to Bears Ears National Monument**

The Access Fund welcomes this opportunity to comment on the U.S. Department of the Interior review of Bears Ears National Monument designated under the Antiquities Act of 1906, pursuant to Executive Order 13792 of April 26, 2017 (82 FR 20429, May 1, 2017). We are confident that this review will show that the process leading to the Bears Ears National Monument designation adequately incorporated public outreach and coordination with relevant stakeholders, and conforms to the requirements of the Antiquities Act of 1906.

**The 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 15,000 members and 100 local affiliates. To achieve its conservation mission, Access Fund encourages and promotes environmental stewardship within the nation's rock climbing community and also engages in specific land management issues that threaten to affect the environmental quality of the nation's climbing areas. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. We have a long history working in the Bears Ears region on a range of management initiatives including the Moab Master Leasing Plan, the Utah Public Land Initiative and the Bears Ears National Monument designation. To learn more, visit [accessfund.org](http://accessfund.org).

**Access Fund Advocacy at Bears Ears**

Access Fund members from Utah and across the country regularly climb in the Bears Ears National Monument because it is a world-class climbing area with unique and exceptional natural and cultural resource values. For nearly twenty years, Access Fund's policy program engaged in land management issues within the State of Utah including participation as a leading stakeholder in several Bureau of Land Management (BLM) planning initiatives and as well as various legislative proposals affecting the area. Access Fund has been working in the Indian Creek area—a world famous climbing area within Bears Ears National Monument—since the late 1990s. In 2004 we participated in a BLM activity plan focused on the Indian Creek corridor, and assisted with the formation of the Friends of Indian Creek (FOIC), a local climbing organization organized in large part due

to the need for the user community (mainly climbers) to address resource needs that were not being addressed by the BLM mostly because of a lack of federal funding.

Significant resource management issues at Indian Creek that required attention included the need for trails, focused camping designations, and infrastructure to address human waste impacts. As a result, Access Fund and FOIC led efforts, in partnership with the Rocky Mountain Field Institute, to design and build climbing access trails. Access Fund continues to conduct trail projects in partnership with the BLM through its Conservation Team; Access Fund employs five professional trail builders and conservation specialists to help local climbing communities assess impacts and climbing area conservation needs, address conservation needs, and provide training on stewardship planning and best practices for keeping their climbing areas healthy. The Access Fund Conservation Team has spearheaded and worked on numerous stewardship projects at Indian Creek within the Bears Ears National Monument, resulting in camping and parking improvements, the installation of toilets, and the construction and maintenance of climbing access trails.

The Access Fund also partnered with the American Alpine Club and outdoor industry companies such as Petzl and Black Diamond on projects related to stewardship education (signage), human waste (we developed a free “wag bag” program that evolved into funding for permanent toilets), and camping (delineated campsites to prevent the “creep” of new sites and impacts). Additional significant advocacy and stewardship efforts conducted by Access Fund at Indian Creek since 2004 include:

- Climbing access and conservation advocacy during the BLM’s 2008 Resource Management Plan process.
- Engagement in a range of specific Indian Creek planning initiatives such as proposed ATV rights-of-way, proposals to institute fees for camping, and outreach to the climbing community to educate them about natural and cultural resource concerns such as endangered species and Native American cultural sites.

However, problems related to extremely low funding levels for the BLM to manage Indian Creek and environs persisted and intensified over the past 10-15 years due to increases in visitation (climbers and motorized enthusiasts) and cultural tourism in the Cedar Mesa region. Access Fund has long advocated for additional federal funding for this world-class landscape to address on-going problems resulting from inadequate management. Appropriate funding, while not the only element necessary for supporting effective land management, could significantly mitigate many of the ongoing and increasing problems in the region.

### **Utah Public Lands Initiative Advocacy**

By 2013, increased interest in large scale conservation and energy development combined with a significant influx of visitors—among other things—led to proposed legislation (the Utah Public Land Initiative or “PLI”) to address a range of land management issues in SE Utah. In 2013, Access Fund began participating in the public process to inform the multi-county PLI that sought to resolve many longstanding issues

in SE Utah including conservation designations, recreation management, energy policy, state land exchanges, and transportation management. The PLI emerged only after it became evident that the Obama administration would consider a national monument for the region if legislation failed. Because the public lands in SE Utah were critically under-resourced (funding and staffing), many stakeholders supported a legislated solution. Accordingly, Access Fund worked hard on a legislative solution for the many public land issues facing SE Utah including the climbing at Indian Creek and the greater Moab region.

This Access Fund work on the PLI included representation on the Grand County working group that resulted in recommendations to Congressman Bishop for his PLI proposal. Access Fund also worked with a wide range of stakeholders (local and state government, tribal representatives, conservation groups, recreation interests, local businesses and landowners) on representing the interests of climbers in the region. Access Fund's advocacy on the PLI (which included several meetings with Department of Interior officials and Congressional offices as well as comments on PLI drafts) continued all the way up to late 2016 when the PLI bill failed to get a vote in Congress. But absent appropriate and legislation, given the longstanding chronic lack of protection and underfunding of the region, many felt that a national monument represented the only viable path towards much needed improved management for Bears Ears and Indian Creek specifically. Indeed, it became clear well before the PLI failed in Congress that the proposal put forth by Congressman Bishop had little chance of passing, and thus Access Fund began robust engagement with Interior Department officials and key stakeholders such as the Inter-Tribal Coalition advocating for climbing access and conservation within a potential national monument over a year (starting in October, 2015) before President Obama designated Bears Ears national Monument.

### **Bear Ears National Monument Stakeholder Input**

In advocating for climbing interests at a possible Bears Ears National Monument (see attached map of climbing resources within Bears Ears National Monument), Access Fund staff dedicated hundreds of hours during 2015 and 2016 engaging with a wide range of stakeholders, including tribal interests, local government, the conservation community, local businesses, and recreation groups to advocate for permanent protection for the Bears Ears landscape through national monument designation. This collaborative process eventually resulted in the Bears Ears Inter-Tribal Coalition submitting a letter on October 7, 2016 to the Secretary of the Interior endorsing the inclusion of rock climbing as a legitimate use of monument lands in the presidential proclamation. Also on October 7, 2016 Access Fund submitted its own letter to the Secretary of the Interior formally endorsing the establishment of a Bears Ears National Monument and advocating for the inclusion of rock climbing as a legitimate use of monument lands in the presidential proclamation. Ultimately, for the first time in history, President Obama expressly mentioned rock climbing as one of the recreational opportunities to be valued and protected through the establishment of the Bears Ears National Monument.

Access Fund worked for nearly a year supporting national monument protection for Bears Ears that included the recognition of rock climbing as a highly valued use of the area that affords a unique opportunity for the public to experience the historic and scientific objects to be protected by the national monument. This Access Fund work related specifically to understanding and advocating for a national monument—in conjunction with climbing and recreation groups such as the American Alpine Club, American Whitewater and International Mountain Biking Association—and included:

- Several meetings throughout 2016 in Washington, DC with the Secretary of the Interior’s Office, the Council on Environmental Quality and Congressional offices with oversight of public lands (who were also in charge of the PLI).
- Meetings and presentations to the Inter-Tribal Coalition who were the initial proponents of the monument; this resulted in a letter from the Inter-Tribal Coalition to Department of Interior recognizing the compatible and valued climbing use in the Bears Ears area.
- Meetings with the local Utah climbing community (including users, advocates and outfitters) to understand climber perspectives on public land management, recreation access, and conservation. A key value to climbers that is advanced by a national monument at Bears Ears is the establishment of a monument plan that can bring long-overdue landscape-level management to an area threatened by over-use, resource extraction, and a chronic lack of management and agency resources needed to address multiple-use impacts. By continuing insubstantial and ad hoc management of this world-class resource, the long term climbing experience will be significantly diminished.
- Overflights of the Bears Ears region with the media along with tribal and conservation interests.
- Touring the Indian Creek Corridor with Interior Secretary Jewell to demonstrate the world class nature of the Indian Creek area to climbers and the high need for better management of the larger Bears Ears region.
- Attendance at public meetings in Blanding and Bluff, Utah where Department of Interior and Department of Agriculture officials heard extensive public comments on a proposed Bears Ears National Monument.

### **Additional Considerations**

The Access Fund believes strongly that the process leading to the establishment of Bears Ears National Monument—which necessarily includes the three-year failed PLI process that was the antecedent to the Bears Ears proclamation—adequately considered public outreach and coordination with relevant stakeholders. Importantly, the Bears Ears National Monument designation conforms to the Antiquities Act’s requirements to appropriately balance the protection of landmarks, structures, and objects in the monument with potential effects on surrounding lands and communities. Accordingly, we believe Bears Ears National Monument constitutes “the smallest area compatible with the proper care and management of the objects to be protected” because the Bears Ears National Monument boundary was informed by extensive stakeholder input that provided comprehensive geospatial information regarding the location of critical cultural, natural

and recreation resources.

In addition, the lands designated by the proclamation creating Bears Ears National Monument were appropriately classified, as required by the Antiquities Act, as “historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest.” Also, because nearly all uses of the Bears Ears region will be preserved in Bears Ears National Monument (except for mineral development that is historically mostly absent within the national monument boundaries), the multiple-use policies of the Federal Land Policy and Management Act remain intact and respected (including effects on the available uses of Federal lands beyond the monument boundaries). Accordingly, the use and enjoyment of non-Federal lands within or beyond monument boundaries continues essentially as it was prior to the December 28, 2016 proclamation, and the concerns of State, tribal, and local governments affected by a designation, including the economic development and fiscal condition of affected States, tribes, and localities, was given significant consideration. However, without a properly funded plan for the monument, visitor use and critical resources such as cultural sites will continue to suffer at Bears Ears, and the economy of San Juan County will continue unsupported and left in limbo despite the rare opportunity presented by the new designation. With increased federal funding from Congress (long overdue), there will be enough Federal resources to properly manage designated areas.

\*

\*

\*








Given the experience noted herein, the Access Fund is confident that the process leading to the Bears Ears National Monument designation appropriately incorporated public outreach and coordination with relevant stakeholders, and that the specifics of the designation conforms to the requirements of the Antiquities Act of 1906. Accordingly, Access Fund urges the administration to preserve the Presidential Proclamation of December 28, 2016 that established the Bears Ears National Monument and to provide adequate funding for a monument management plan.

Sincerely,

A handwritten signature in black ink that reads "Erik Murdock". The signature is written in a cursive, slightly slanted style.

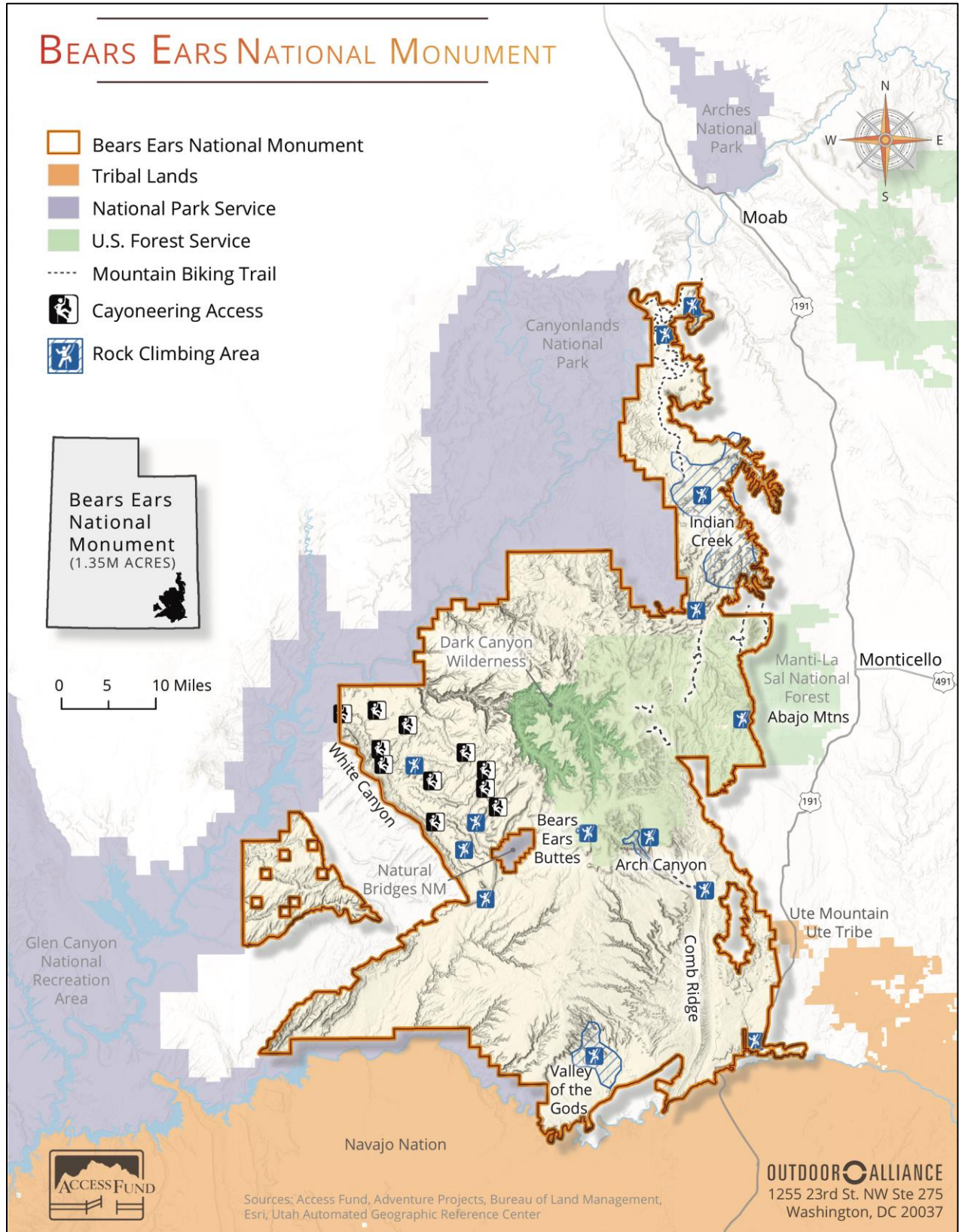
Erik Murdock  
Policy Director  
Access Fund

# BEARS EARS NATIONAL MONUMENT

-  Bears Ears National Monument
-  Tribal Lands
-  National Park Service
-  U.S. Forest Service
-  Mountain Biking Trail
-  Canyoneering Access
-  Rock Climbing Area



0 5 10 Miles



Sources: Access Fund, Adventure Projects, Bureau of Land Management, Esri, Utah Automated Geographic Reference Center

**OUTDOOR ALLIANCE**  
 1255 23rd St. NW Ste 275  
 Washington, DC 20037