



March 21, 2016

Planning Team

Black Canyon of the Gunnison National Park /Curecanti National Recreation Area  
102 Elk Creek  
Gunnison, CO 81230

E-mail: [cure\\_info@nps.gov](mailto:cure_info@nps.gov)

**RE: Alternative Scoping for the Black Canyon of the Gunnison National Park and the Curecanti National Recreation Area Wilderness and Backcountry Management Plan**

Dear Park Planning Team:

The Access Fund and Gunnison Valley Climbers welcome this opportunity to comment on the the alternatives for the Wilderness and Backcountry Management Plan for the Black Canyon of the Gunnison National Park (the “Black Canyon”) and the Curecanti National Recreation Area (NRA). Many of our members regularly climb and camp in the Black Canyon. We suggest herein a few significant changes that will protect wilderness resources while also preserving the unique climbing opportunities found only in the Black Canyon. In general, we believe that the alternatives listed in the scoping document do not represent the full suite of wilderness climbing management alternatives that should be considered when drafting a well-balanced wilderness and backcountry management plan.

### **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 supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 11,000 members and 100 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Colorado is one of our largest member states, and several of the Access Fund’s affiliate local climbing organizations have an interest in Black Canyon climbing. The Access Fund is also a member of the Outdoor Alliance, a national coalition representing the nation’s climbers, hikers, backcountry skiers, mountain bikers and paddlers ([www.outdooralliance.org](http://www.outdooralliance.org)). To learn more about the Access Fund, see [www.accessfund.org](http://www.accessfund.org).

## **Gunnison Valley Climbers**

Gunnison Valley Climbers is focused on the conservation of our climbing resources through stewardship and education, while adhering to and respecting the ethics and rich history of the area's pioneers. The Gunnison Valley hosts opportunities for all styles of climbing and will undoubtedly suit anyone's interest whether it be bouldering, cragging, or big-walling. There is an unparalleled sense of community amongst the climbers in the Gunnison Valley where a tremendous amount of respect is given to the area's ethics and how the crags are treated.

### **COMMENTS**

The Access Fund and Gunnison Valley Climbers provide the following specific comments and recommendations to help develop appropriate alternatives for the Wilderness and Backcountry Management Plan. Our comments regard 1) fixed anchor authorization, 2) wilderness zone boundaries, and 3) commercial guiding.

#### **Black Canyon Climbing**

The Black Canyon of the Gunnison is one of the country's most significant traditional rock climbing locations and has an international reputation as one of America's most adventurous wilderness climbing areas. Big wall climbs were established here in the early 1960s by pioneers such as Layton Kor including the Painted Wall, Colorado's "tallest cliff." Through the decades several long free-climbing and big wall classics were established in the Black Canyon including The Cruise, Air Voyage, Hallucination Wall, Astro Dog, Atlantis, and many others.<sup>1</sup> The Black Canyon is also the site of many difficult and cutting edge traditional free climbs known as much for their boldness as difficulty. The Black Canyon offers a unique climbing experience and is considered by many as the epitome of long, traditional, backcountry wilderness climbing. The Black Canyon's wilderness climbing opportunities and dramatic setting make the Black Canyon one of the most unique and important climbing areas in the US and internationally.

#### **Fixed Anchor Authorization**

The Black Canyon is a world-class multi-pitch traditional climbing area where climbers occasionally need to use fixed anchors for ascent and descent. The Access Fund supports the portions of the Interim Climbing Management Plan (CMP)<sup>2</sup> that promote "clean climbing," requires authorization for new fixed anchors, and manages new routes to meet the desired conditions for protection of Black Canyon and Curecanti NRA.<sup>3</sup>

---

<sup>1</sup> See <http://www.mountainproject.com/v/black-canyon/105744397>

<sup>2</sup> Black Canyon of the Gunnison, Interim Climbing Management Plan, NPS, referenced on 3/16/2016 at [http://www.nps.gov/blca/planyourvisit/upload/BLCA\\_climbing\\_plan.pdf](http://www.nps.gov/blca/planyourvisit/upload/BLCA_climbing_plan.pdf)

<sup>3</sup> Black Canyon of the Gunnison Wilderness and Backcountry Management Plan-Alternative Scoping Details.

However, the Interim CMP outlines a fixed anchor authorization process that could be improved to allow more “unconstrained”<sup>4</sup> forms of climbing while adhering to wilderness management principles. The Interim CMP states, “To be approved for a special exception to this regulation [placing fixed anchors], climbers will notify park staff of the site of the proposed fixed anchors (requiring rock alteration for installation) and a written statement as to why they feel that this site warrants fixed anchors (requiring rock alteration for installation).”<sup>5</sup> Director’s Order #41 clearly states that authorization is necessary for new fixed anchors; however, the type of authorization may range from programmatic to case-by-case depending on the site-specific characteristics of a wilderness climbing resource. We believe that a programmatic authorization for placing fixed anchors is well-suited to the climbing style, visitor-use levels, and visitor flow patterns at Black Canyon.

Establishing the minimum amount of regulation that would effectively achieve the desired result for managing an area as wilderness is a fundamental principle for managing visitor activities in wilderness.<sup>6</sup> This principle is recognized in wilderness management practices as the “minimum regulatory tool.”<sup>7</sup> Wilderness fixed anchor management should provide provisions (programmatically or case-by-case basis) to allow climbers some level of control, while in a wilderness setting, to make decisions regarding fixed anchor placements where no other options are available. Such policies allow climbers to make legal, critical decisions regarding personal safety in unforgiving conditions often experienced in rugged wilderness. Only a very small minority of climbers partake in wilderness-based first ascents that involve the placement of fixed anchors; however, the ability of climbers to place a *de minimus* number of wilderness fixed anchors is a privilege worth protecting because it embodies “outstanding opportunities for solitude or a primitive and unconfined type of recreation”<sup>8</sup> associated with the purest forms of wilderness exploration.

The Black Canyon of the Gunnison National Park should model their fixed anchor authorization process on the successful programmatic authorization processes used in Rocky Mountain and Zion National Parks - where a much higher volume of climbing occurs in designated wilderness yet managers impose fewer restrictions on the placement of new fixed anchors. Under these successful plans, resource indicators are monitored to determine whether any impacts are caused by fixed anchor use, and if so whether restrictions are necessary. As per Director’s Order #41<sup>9</sup>, Black Canyon National Park should consult Zion National Park<sup>10</sup> to learn more about climbing-

---

<sup>4</sup> Wilderness Act of 1964, Pub. L. 88-577, § Sec. 2(c)(2).

<sup>5</sup> Black Canyon of the Gunnison, Interim Climbing Management Plan, NPS, referenced on 3/16/2016 at [http://www.nps.gov/blca/planyourvisit/upload/BLCA\\_climbing\\_plan.pdf](http://www.nps.gov/blca/planyourvisit/upload/BLCA_climbing_plan.pdf)

<sup>6</sup> Hendee, J. C., Stankey, G. H., & Lucas, R. C. (1990). *Wilderness Management*. Golden, CO: North American Press.

<sup>7</sup> National Wilderness Steering Committee (2006). Guidance White Paper #3, *Minimum Requirements Decision Process*. National Park Service.

<sup>8</sup> Wilderness Act of 1964, Pub. L. 88-577, § Sec. 2(c)(2).

<sup>9</sup> Director’s Order #41 mandates that NPS units consult with other NPS units to share climbing management strategies and experiences.

<sup>10</sup> See <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-forreview.htm>

related resource indicators and standards that are used to develop fixed anchor management options.

Zion's fixed anchor policy is as follows:

*Bolts should be considered the tool of last resort by visitors who are creating anchors. As mentioned above climbers, canyoneers, and others creating anchors will be encouraged to use natural colored anchor material (slings and hangers). The park will continue to monitor bolting in the backcountry.*<sup>11</sup>

Rocky Mountain National Park also employs an effective fixed anchor policy in its Backcountry/Wilderness Plan<sup>12</sup> as follows:

*The use of removable and fixed anchors, as well as other climbing equipment, is appropriate in wilderness. However, fixed anchors 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 desired and highly recommended. Fixed anchors should not be placed merely for convenience or to make an otherwise "unclimbable" route climbable.*

The DRAFT Wilderness and Backcountry Management Plan should therefore offer an additional alternative regarding fixed anchor authorization beyond the scope of the Interim CMP. The Alternatives Scoping document only offers one alternative: case-by-case authorization. The Interim CMP predates advancements in NPS wilderness climbing management, the issuance of Director's Order #41, and does not represent the current spectrum of wilderness fixed anchor management alternatives. Given the success of programmatic authorizations at national parks with higher use-levels, it is certainly appropriate to offer an alternative that reflects the full range of NPS management practices. The DRAFT Wilderness and Backcountry Management Plan should include an array of climbing management alternatives so that the public can provide input on more than one viable option.

## **Wilderness Zone Boundaries**

The precise boundaries between the Black Canyon's primitive and pristine wilderness zones proposed in alternatives B and C are difficult to distinguish from the limited detail available. Providing more definitive boundary descriptions (including better maps along with verbal descriptions) for the primitive and pristine wilderness zones would clarify the matter for climbers and Park staff alike, while also raising awareness of the Park's sensitivities and increasing compliance with new rules. We request a detailed written description similar to the statement below be included in the alternatives. *"The western-most boundary of the Inner Canyon*

---

<sup>11</sup> See <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-forreview.htm>

<sup>12</sup> See Rocky Mountain National Park's Backcountry/Wilderness Management Plan at 2-40, [http://www.nps.gov/romo/parkmgmt/upload/alternatives\\_2.pdf](http://www.nps.gov/romo/parkmgmt/upload/alternatives_2.pdf).

*Primitive Wilderness Subzone includes the Southern Arête rock climbing route. The eastern boundary of the Inner Canyon Pristine Wilderness Subzone is immediately west and downriver of the Southern Arête rock climbing route. The Southern Arête is the westernmost arête of the Painted Wall. All rock walls west or downriver of the Southern Arête are considered to be in the Inner Canyon Pristine Wilderness Subzone.*"<sup>13</sup>

Efforts should be made by the NPS to ensure that the primitive/pristine wilderness boundary does not intersect or include established rock climbs within the Black Canyon. Existing routes with fixed anchors should not be included within the boundaries of the pristine wilderness zone. The specific location of the boundary has significant implications for climbers who may be banned from placing any new fixed anchors in the pristine zone.

### **Commercial Guiding in the Black Canyon National Park**

The guiding ban under Alternative C is unnecessary and unjustified. Historically, climbers interested in a Black Canyon wilderness climbing experience could hire a professional guide. The Access Fund and the Gunnison Valley Climbers support a range of appropriate wilderness climbing opportunities, including with a guide. Alternative C would prohibit guiding *"To attain the greatest opportunities for challenge, self-reliance, and adventure that are paramount to the wilderness character of the inner canyon wilderness zone"*.<sup>14</sup> We disagree with this assessment and believe that some level of guided climbing should always be allowed in the Black Canyon.

Climbing in the Black Canyon is always challenging, adventurous, and requires a high degree of self-reliance whether guided or not. The objective hazards are the same for guided and non-guided climbers, and the inner canyon's wilderness character and remoteness make climbing in the Black exceedingly "challenging, self-reliant, and adventurous" for every climbing party regardless of whether a guide was hired. Further, all climbers (including those guided) are self-reliant in the Black because all routes require climbers to climb out (or hike out if they fail). Carefully managing the number of guiding permits and/or designating guided routes and locations is a better means for preserving the wilderness climbing experience at the Black Canyon rather than an unnecessary prohibition on guiding. Therefore, offering a range of alternatives that provide options for managing guiding is much more appropriate and suitable for the DRAFT Wilderness and Backcountry Management Plan.

\* \* \*

The Access Fund and the Gunnison Valley Climbers applaud the Black Canyon National Park's efforts to develop scoping alternatives to achieve the appropriate management balance between resource protection and recreational climbing. We urge you to consider adding alternatives that include 1) programmatic fixed anchor authorization, 2) clarification on the location of the primitive/pristine zone boundary, and 3) more options for commercial guiding. Thank you for

---

<sup>13</sup> Personal communication with Ken Stahlnecker, Chief of Resource Stewardship and Science, Black Canyon of the Gunnison National Park, March 16, 2016.

<sup>14</sup> Black Canyon of the Gunnison Wilderness and Backcountry Management Plan-Alternative Scoping Details.

your invaluable work on this important planning process. Please contact me with any questions or concerns regarding climbing management.

Best Regards,

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

A handwritten signature in blue ink that reads "Peter Horgan". The signature is written in a cursive, slightly slanted style.

Peter Horgan  
President, Gunnison Valley Climbers

Cc:

Brady Robinson, Access Fund  
Maria Millard, American Alpine Club  
Alex Kosseff, American Mountain Guides Association