

June 12, 2013

RMP Comments
Bureau of Land Management
Grand Junction Field Office
2815 H Road
Grand Junction, CO 81506
Gjfo_rmp@blm.gov

RE: Access Fund and Western Colorado Climbers' Coalition Comments on the Draft Resource Management Plan/Draft Environmental Impact Statement for the Colorado Bureau of Land Management Grand Junction Field Office

Dear Planning Team,

The Access Fund and Western Colorado Climbers' Coalition welcome this opportunity to comment on the *Draft Resource Management Plan and Draft Environmental Impact Statement* (Draft RMP/EIS) for the Colorado Bureau of Land Management (BLM) Grand Junction Field Office (GJFO). The BLM lands administered by the GJFO provide unique rock climbing opportunities, ranging from bouldering to traditional climbing. We appreciate that the GJFO recognizes climbing as a legitimate use of the planning area in the Draft RMP/EIS. The Access Fund and Western Colorado Climbers' Coalition are committed to assisting planners by providing climbing management expertise, resources, and community outreach.

Access Fund

Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land. Colorado is our second largest member state and many of our members regularly travel to climb on lands managed by the GJFO. For more information about the Access Fund, visit www.accessfund.org.

Western Colorado Climbers' Coalition

An Access Fund affiliate, the Western Colorado Climbers' Coalition is dedicated to preserving access to Western Colorado's climbing areas through land stewardship, education and land use advocacy.² The Western Colorado Climbers' Coalition works closely with the GJFO to help manage climbing by providing local expertise, educational outreach and organizing volunteer trail work and stewardship events. In fact, the Access Fund and Western Colorado Climbers' Coalition own property in Unaweep Canyon that was purchased in part to help protect access to BLM managed climbing resources. The Western Colorado Climbers' Coalition and Access Fund look forward to strengthening our partnership with the GJFO.

COMMENTS

These comments are meant to supplement our comments previously submitted in 2009 during the scoping phase of this planning initiative.³ The Access Fund and Western Colorado Climbers' Coalition support the GJFO's (Preferred) Alternative B, including its various Recreation Management Area Designations and Travel Management Plan. Under Alternative B, most climbing resources fall within either Special Recreation Management Areas (SRMA) or Extensive Recreation Management Areas (ERMA). However, climbing is a low impact activity that, when properly managed, is compatible in sensitive areas such as an Area of Critical Environmental Concern or Wilderness Study Area. Proven policies in use around the country successfully protect wilderness characteristics as well as natural and cultural resources while allowing climbing.

As stated in the Draft RMP/EIS, "[t]he RMP does not describe how particular programs or projects would be implemented or prioritized; rather, those decisions are deferred to more detailed implementation-level planning." Appendix K is the Draft Recreation and Visitor Services Management Framework for the GJFO and provides the Field Office Wide Goals and Objectives for managing recreation. The Draft Recreation and Visitor Services Management Framework recognizes the importance of recreation and provides the best management practices, goals and objectives for SRMAs, ERMAs, and undesignated lands. The Western Colorado Climbers' Coalition and Access Fund have the local expertise and national perspective to assist the GJFO with identifying and prioritizing the "measurable outcome-focused objectives" and develop management policies that maximize the benefit of SRMAs and ERMAs. We can also assist the GJFO with "management actions and allowable use decisions" related to climbing resources within undesignated lands.

Access Fund and Western Colorado Climbers' Coalition Assistance

Please contact us for assistance with developing climbing management policies for the BLM lands administered by the GJFO. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*⁵ and website www.climbingmanagement.org, have both proven to be useful tools for land managers across the

country. The climbing community, Access Fund and Western Colorado Climbers' Coalition are ready, willing, and able to help planners implement and prioritize climbing related programs or projects during implementation-level planning. In addition, some aspects of this planning initiative may qualify for funding from the Access Fund Climbing Preservation Grant Program⁶ or assistance from our Conservation Team⁷ which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

* * *

Thank you for your consideration of climbing management for the BLM lands administered by the Grand Junction Field Office. The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as this planning process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,

s/ Jesse Zacher

R.D. Pascoe Policy Director Access Fund

Jesse Zacher President

Western Colorado Climbers' Coalition

Cc: Brady Robinson, Access Fund, Executive Director Collin Ewing, BLM GJFO, Project Leader

¹ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

² http://www.westernslopeclimbers.blogspot.com/

³ http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CO BLM%20Grand%20Junction 1 1.9.2009.pdf

⁴ Draft RMP/EIS, Executive Summary (ES.2) Purpose of and Need for the Resource Management Plan at p. ES-4.

⁵ http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf.

⁶ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants program.htm.

⁷ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation Team.htm.