



Protect America's Climbing



October 28, 2022

Bears Ears National Monument
Resource Management Plan Project Manager
BLM Monticello Field Office
365 North Main
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via email: blm_ut_mt_comments@blm.gov

RE: Climbing Organizations' Scoping Comments to Bears Ears National Monument Resource Management Plan

Bears Ears National Monument Planners:

The Access Fund, American Alpine Club, and Friends of Indian Creek (“Climbing Organizations”) welcome this opportunity to provide input in the planning process for Bears Ears National Monument (BENM) Resource Management Plan (RMP). As modern climbers, we recognize we are newcomers to this internationally significant cultural landscape, which bears evidence of ancient climbing feats that put our recreational pursuits in perspective. We are committed to being good partners to Indigenous peoples who have made this area home for millenia, and still do so, and to working with all other stakeholders who care about this region to ensure it is preserved for future generations.

This planning area contains some of the most scenic, wild and adventurous rock climbing in the desert southwest, most notably Indian Creek, a world-class climbing area attracting thousands of climbers from across the United States and internationally each year. This plan also affects less frequented but nonetheless iconic sandstone climbing areas, such as Arch Canyon and Valley of the Gods. The Climbing Organizations’ members regularly climb at these locations, and we have provided climbing management comments, funding, expertise and labor for stewardship projects, and community outreach throughout this planning area for several years to assist the Bureau of Land Management (BLM) and US Forest Service (USFS) regarding various projects to ensure the appropriate management of the climbing resources found within this national monument.

The Climbing Organizations

Access Fund

The Access Fund is a national advocacy organization whose mission is to lead and inspire the climbing community toward sustainable access and conservation of the

climbing environment. A 501(c)(3) non-profit supporting and representing over 7 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 20,000 members and 130 affiliates. We currently hold memorandums of understanding¹ with the Bureau of Land Management and U.S. 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 for climbing areas across the country including the BENM region, and Utah is one of our largest member states. For more information about the Access Fund, visit www.accessfund.org.

American Alpine Club

The American Alpine Club is a 501(c)(3) non-profit organization based in Golden, Colorado, with over 25,000 members nationally. Founded in 1902 to support the research and exploration of mountainous regions, the AAC remains committed to supporting the climbing and human-powered outdoor recreation communities over a century later. Grounded in community and place, the AAC's mission is to share and support our passion for climbing and respect for the places we climb. Through education, community gatherings, stewardship, policy, advocacy, and scientific research, the AAC strives to build a united community of competent climbers and healthy climbing landscapes.

Friends of Indian Creek

The Friends of Indian Creek (FOIC), a 501(c)(3) climbing stewardship organization and Local Climbing Organization (LCO) member of the Access fund, works with land managers in the Greater Canyonlands area to promote responsible climbing, and provide resources that help alleviate recreation's impact throughout southeastern Utah. The mission of the Friends of Indian Creek is to promote responsible recreation to ensure the conservation of Indian Creek's natural resources and primitive character. Since its founding in 2005, FOIC has funded and orchestrated projects throughout the Indian Creek and Greater Canyonlands climbing areas.

Along with our partners, FOIC has contributed funding and thousands of volunteer hours for numerous stewardship projects including: the implementation of a Wag² Bag (human waste disposal) program implemented to manage human waste prior to the construction of permanent toilets at the Superbowl Campground and Supercrack climbing area. FOIC also designed and installed climber-targeted Leave No Trace signage at several key locations throughout Indian Creek. FOIC also participated in the Leave No Trace 2019 "Hot Spot" program and provided financial support for the Indian Creek Climbing Steward program in 2021/2022. FOIC supported several Access Fund trail building and stewardship projects to areas including 4x4, Pistol Whipped, Blue

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

² WAG Bag is defined as a waste alleviation and gelling bag.

Gramma, Scarface, Supercrack Buttress, Donnelly Canyon/Battle of the Bulge, and Way Rambo. We have also worked on inventories and monitoring of dispersed campsites in 2019/2020 to assess the impacts and use of dispersed camping areas by climbers and other user groups. FOIC has led communications to climbers regarding support and education for voluntary climbing closures to protect cliff-nesting raptors and education and outreach on best climbing and camping practices in Indian Creek through social media sites and events.

Background

For over twenty years, the Climbing Organizations have worked on land management policy and stewardship initiatives throughout the State of Utah and the Bears Ears region specifically, including participation as a leading stakeholder in several BLM planning initiatives and various legislative proposals affecting southeastern Utah. Access Fund has been working in the Indian Creek area since the late 1990s, and participated in several regional public land initiatives, including the BLM 2004 Indian Creek activity plan, the BLM's Moab and Monticello 2008 Resource Management Plans, the 2016 Moab Master Leasing Plan, and other planning, management and stewardship initiatives. In addition, staff served on county committees and represented climbing and other recreation interests for three years on the Utah Public Land Initiative (PLI). Following the failed PLI legislative effort, the Climbing Organizations advocated for climbers during the process related to the December 28, 2016 Proclamation 9558 establishing BENM,³ which acknowledged "rock climbing" as providing "world class recreation" within the monument and established an advisory committee with at least one designated seat for "recreational users." This acknowledgment of climbing in the BENM proclamation is significant because it confers a prominent stakeholders role in planning for BENM due to the world-class quality of the climbing resource and experience found only at Bears Ears, in particular the Indian Creek corridor.

Access Fund has invested hundreds of thousands of dollars in stewardship efforts at Indian Creek since the late 1990s. Our professional trail building crews—the Access Fund Conservation Teams—have been building sustainable climbing access trails since 2011 with support from grant programs like the Utah Office of Outdoor Recreation and the Utah Regional Trails Program. The Conservation Team program also inspires volunteerism, and its "Work Week in the Creek" engages climbers in on-the-ground trail building work while educating them on stewardship and low impact recreation. Access Fund has led this active stewardship work in partnership with organizations like the Conservation Legacy's Ancestral Lands Conservation Corps, Front Range Climbing Stewards, Rocky Mountain Field Institute, Friends of Indian Creek and the local Monticello BLM office. This work and support from Access Fund and our partners has resulted in improved parking areas, several weeks of annual volunteer stewardship initiatives, approximately four miles of sustainable access trails at eight different

³ See

<https://obamawhitehouse.archives.gov/the-press-office/2016/12/28/proclamation-establishment-bears-ears-national-monument>.

climbing destinations, improved human waste management, and cultural resource protection.

In 2021, Access Fund launched the innovative Climber Steward program in the Creek, which provides for two climbers to live full time in the area during the prime spring and fall climbing seasons to educate and engage climbers and other members of the public on low impact recreational practices. This work is carried out under a formal Assistance Agreement with the Monticello Field Office, and it is also supported by the Nature Conservancy. Through its Climbing Conservation Grants Program, Access Fund has also directly funded key improvements in the Indian Creek corridor like vault toilet installations, kiosks, signage and trail crew resources as well as data collection on climber impacts, all with an eye towards ensuring that recreation is well managed and sustainable over the long-term.

For decades the Climbing Organizations have taken a very strong interest in the many and varied management plans and other proposals for the area including Resource Management Plans, activity level plans (especially for the Indian Creek Corridor), various travel management initiatives, business plans for campgrounds and outfitter plans for climbing guides at Indian Creek. Much of our work has focused on stewardship projects hardening authorized campsites, funding and building toilets, and establishing climbing access trails to specific climbing locations. Through all of these projects we have worked closely with the BLM, and the primary landowner at Indian Creek, The Nature Conservancy and the Canyonlands Research Center at Dugout Ranch.

The Climbing Organizations have also worked hard to collaborate with the Inter-Tribal Coalition on management objectives for Indian Creek and BENM generally. This collaboration was particularly significant during the Public Land Initiative legislative efforts that failed in 2016, and the subsequent national monument designations involving Bears Ears National Monument. Prior to President Obama's proclamation establishing Bears Ears National Monument, the Climbing Organizations worked closely with a range of Tribal interests to better understand how we might work together collectively to protect the unique landscape and resources found at BENM. This resulted in a letter to former Interior Secretary Sally Jewell from the Bears Ears Inter-Tribal Coalition expressing a "strong sense of common cause" with the climbing community, and

... that the climbers will be committed and effective advocates for good land-use policies and practices in the Bears Ears National Monument. In particular, we believe that climbing should properly be included in the Presidential proclamation as a legitimate use of monument lands; climbing has never been mentioned in a proclamation to date but we believe it would be appropriate here.⁴

When President Obama designated BENM on December 28, 2016, that proclamation

⁴ Letter to Interior Secretary Sally Jewell from Hopi Vice-Chairman Alfred Lomahquahu and Ute Mountain Ute Tribe Council Member (both Co-Chairs of the Bears Ears Inter-Tribal Coalition), dated October 7, 2016.

acknowledged that

The area contains numerous objects of historic and of scientific interest, and it provides world class outdoor recreation opportunities, including **rock climbing**, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. Because visitors travel from near and far, these lands support a growing travel and tourism sector that is a source of economic opportunity for the region.⁵

When President Biden issued Proclamation 10285 that “confirms, restores, and supplements the boundaries and protections provided by Proclamation 9558,” thus reinstating the boundaries of BENM that were downsized by President Trump’s Proclamation 9681,⁶ climbing at Bears Ears was acknowledged twice as a world-class outdoor recreation opportunity found at Bears Ears National Monument that contributes to “social and economic well being,” “including unparalleled rock climbing available at places like the canyons in Indian Creek.”⁷ It is important to note that in 2021 the Access Fund surveyed Indian Creek climbers, and 94% of respondents supported the restoration or even expansion of the monument boundaries established by President Obama in 2016.⁸

Climbing Resources in the Bears Ears National Monument Planning Area

The acknowledgements of “rock climbing” in Presidential Proclamations are results of the Climbing Organizations’ extensive collaboration with the BEITC, our wide-ranging work on many management issues and stewardship projects throughout the region, but also because the climbing found especially at Indian Creek is highly unique and of a quality found nowhere else on the planet. Rock climbing at BENM is an appropriate activity through which to experience the cultural and historic objects projected by the national monument. The Indian Creek Corridor is one of the most popular climbing areas in the United States and is renowned as one the world’s most unique and inspiring rock-climbing destinations. It’s rare to visit a popular cliff at Indian Creek in the spring or fall and not hear many languages being spoken, with visiting climbers hailing from far flung places like Germany, Japan, Australia, and South America. The fact that many of the climbers using the area are not “locals” adds an additional challenge when it comes to education, but it also signifies the area’s international reputation.

Climbers are drawn to the region’s unique combination of scenic beauty, remarkable and historic landscape, desert environment, perfectly fractured crack systems, diversity and concentration of climbing routes, and high-quality compact sandstone—a combination

⁵ See Presidential Proclamation 9558 -- Establishment of the Bears Ears National Monument, found at <https://obamawhitehouse.archives.gov/the-press-office/2016/12/28/proclamation-establishment-bears-ears-national-monument>.

⁶ Presidential Proclamation 9681 -- Modifying the Bears Ears National Monument, found at <https://trumpwhitehouse.archives.gov/presidential-actions/presidential-proclamation-modifying-bears-ears-national-monument/>.

⁷ A Proclamation on Bears Ears National Monument – Proclamation 10285, found at <https://www.govinfo.gov/content/pkg/DCPD-202100834/html/DCPD-202100834.htm>.

⁸ See https://d1w9vyyvm276tvm.cloudfront.net/assets/AF_IC_2021_Sum_Report.pdf at page 15.

unique to the area. Modern-day climbers have been visiting Indian Creek since the 1960s. The tower formations and the many parallel-sided crack systems on the canyon walls provide well-known climbing routes such as *Supercrack* (FA 1976), *The Incredible Hand Crack* (FA 1978), and *Lightning Bolt Cracks* (FA 1975) among thousands more.⁹ In addition to the physical rewards climbers find in scaling the amazing routes found at BENM, climbers are also very inspired and humbled by the important cultural resources found in the area and this largely factored into the climbing community’s support of the Monument designation (see Figure 1).

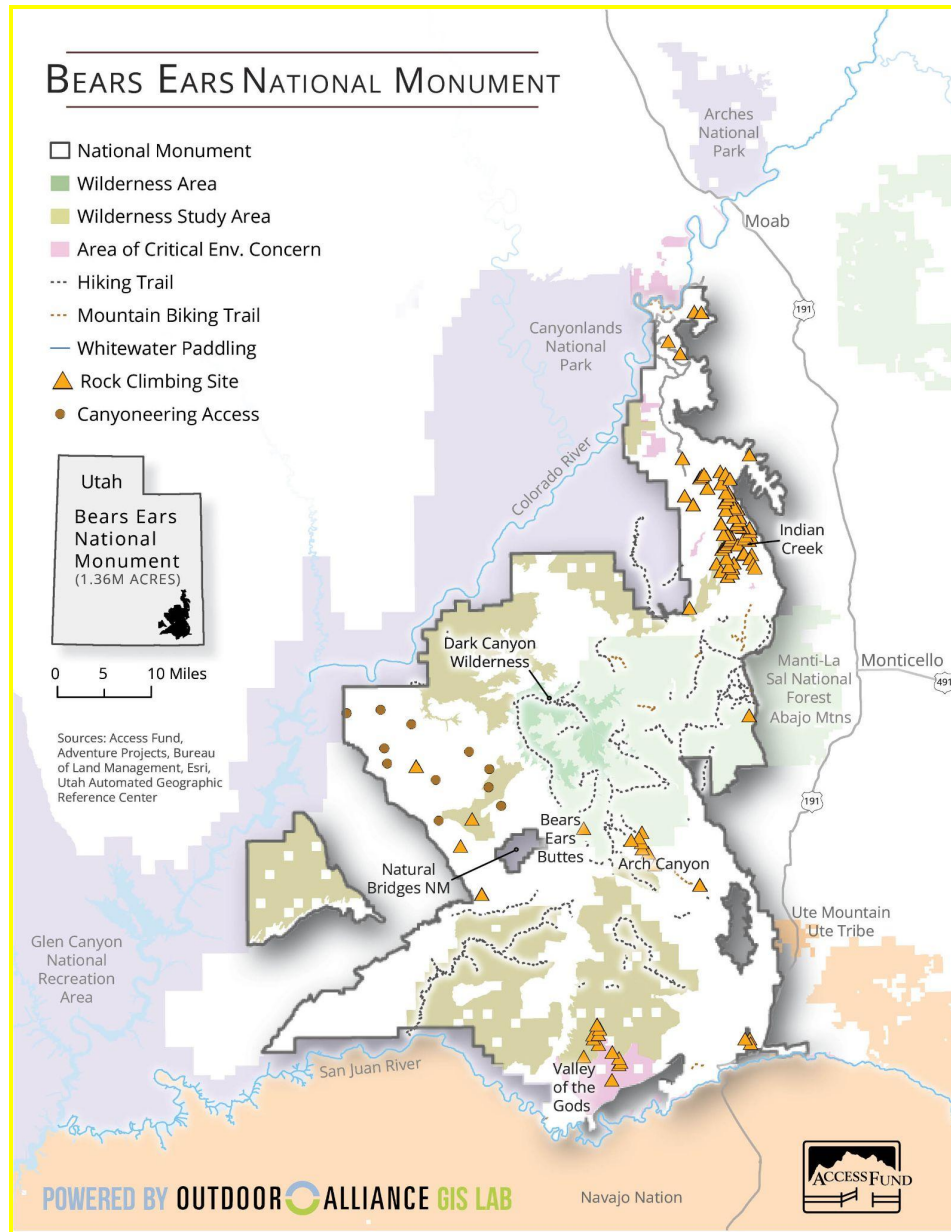


Figure 1. Bears Ears National Monument Rock Climbing Sites

⁹ See <https://www.mountainproject.com/area/105716763/indian-creek>

The scenic quality and cultural features of Indian Creek and BENM contribute to the deep personal attachment that many people have for the area. Most climbers agree that Indian Creek should remain as primitive as possible, but believe in adaptive management to mitigate recreation impacts from increased use-levels. Accordingly, we believe that the BLM should select a management direction in this plan that maintains the largely undeveloped character of Indian Creek and BENM, preserving its outstanding landscape qualities. The Climbing Organizations believe the BLM should also consider the unique and world-class climbing opportunities at Indian Creek when developing management alternatives and implementing related decisions. There is no other climbing area in the world like Indian Creek and this recreational value should be emphasized in any management initiative that is established for BENM and Indian Creek specifically.

User-group and Geographic Specific Planning

We encourage the agencies working on this planning effort to engage in a strategic approach to planning that differentiates the needs and impacts from different recreation groups in different geographies. We readily acknowledge that climbers, as a user group, do have impacts on the landscape and on the experience of other users. As advocacy organizations, we work hard to educate climbers, minimize impacts, create proactive stewardship opportunities, and work collaboratively with other user groups. However, it is important that management focus on the unique attributes of particular recreational activities and that the differences between user groups are considered thoughtfully. Our reading of the recently released analysis of the management situation suggests that impacts of recreation are largely being lumped together at this stage of the management process. While some impacts are similar between groups and across geographies, others are not.

For example, climbers are, by far, the largest user group in the Indian Creek corridor. Likely the second largest user group would be ATV users, although those users generally use a different portion of the corridor (Hamburger Rock and Lockhart Basin vs. the main canyon where climbers frequent). Other recreational users are mostly passing through Indian Creek enroute to the Needles District of Canyonlands, with by far the most likely stop being at Newspaper Rock. By and large, it behooves all of us to try to keep Indian Creek from becoming an area used heavily by other user groups. For example, the Canyon's cultural resources see relatively low visitation compared to other areas of BENM, like Comb Ridge and Cedar Mesa. If the cultural resources of the canyon get promoted, the relatively large number of people traveling to the Needles and the already visiting climbers could easily overwhelm those cultural sites. As such, we propose it makes sense to keep the focus on climbing within the Indian Creek corridor (or Special Recreation Management Area) and not encourage visitation from new potential user-groups, which will require even more resources and potentially create conflicts between users.

One notable exception is the increasing visitation by climbers to the large cliff dwelling adjacent to the "Sparks Wall" and at the left side of the "Cultural Resources Wall." This sensitive site is visible from the Beef Basin Road and from the two above mentioned

climbing walls. Some form of educational signage and site management is needed at this site to limit further impacts.

Regarding differences in user-group impacts, we would posit that climbers and other user groups tend to have quite different behavior profiles, and management strategies should therefore be unique, adaptive and site-specific for diverse user-groups. For example, the impact climbers have is fairly concentrated and predictable: focused around camping areas, parking areas, approach trails to cliffs, and the base and walls of the crags themselves. ATV and hiker user impacts tend to spread wider on the landscape. For example, in BENM, a large majority of hikers are intending to visit cultural sites, some of which are known to managers but many of which are not. This intention to explore and find cultural sites is a unique feature of hikers at BENM, which is not shared with climbers, who largely are coming to climb established routes that are well documented in guidebooks (both printed and online).

A large majority of visitor days from the climbing community are concentrated on approximately 20 climbing crags at Indian Creek that are well known, are relatively close to a road (mostly highway 211 and Beef Basin Road), and are within the existing Indian Creek Special Recreation Management Unit. Although historically important in other areas of Bears Ears, like Valley of the Gods, the number of climbers visiting other parts of the monument would be a rounding error to the number climbing the well established cliffs at Indian Creek. Nowhere else in the monument are climbers a prominent user group. For example, the towers in Valley of the Gods are ascended very irregularly, with the most popular tower (Eagle Plume) seeing fewer than 20 visitor days from climbers per year. Compare this to one of the tower formations at Indian Creek, which often have a dozen parties summiting on any given day in the spring and fall. At Valley of the Gods, then, the clear user group to manage for are campers and visitors enjoying the scenic drive.

Indian Creek Management Needs

We have long believed that the Bureau of Land Management should dedicate more climbing resources to Indian Creek, and the Climbing Organizations have endeavored to help fill this gap. This is especially true because rock climbing is gaining in popularity and overall visitation is increasing as well. A lack of federal funding and other resources from the BLM's state office has provided inadequate human resources such as field rangers or regular onsite presence. Agency funding that could assist with capital improvements to address increasing demand and the need for more toilets, hardened campsites, designated parking areas, trail and other stewardship needs is also insufficient. Non-governmental organizations such as the Climbing Organizations, Rocky Mountain Field Institute, and others—along with partnerships with the outdoor industry companies such as with Petzl, Black Diamond, Patagonia and others—have provided the funding and expertise to provide for the management and stewardship of the Indian Creek Corridor. This plan should be appropriately funded so it can address the current and future needs addressed herein.

The bulk of Climbing Organizations' interest in this management planning process concerns the Indian Creek Corridor, but the important climbing opportunities in places like Valley of the Gods and Arch and Texas Canyons should be included. Proclamation 9558 acknowledges the area's world class cultural and paleontological resources, and that the protection of BENM will preserve a "diverse array of natural and scientific resources, ensuring that the prehistoric, historic, and scientific values." The Climbing Organizations enthusiastically support the protection of these important resources while also providing management balance for responsible recreation so that the public has an opportunity to experience the objects of historic and scientific interest protected by Bears Ears National Monument and Proclamations 9558, 9681, and 10285. Specifically, the Climbing Organizations urge the BLM to consider the following management issues for this monument plan.

1. Camping

The Climbing Organizations believe that the most significant recreation management issue this plan can address in the Indian Creek corridor concerns camping. As the popularity of climbing in general and Indian Creek specifically have increased, the demand for camping at Indian Creek has grown significantly in the last twenty years. The demand is greatest on 15-20 weekends each year in the spring and fall, when all campgrounds are full, all frequently used dispersed sites are used, and pressure is created for new sites to be "created" by desperate visitors. These new sites impact the fragile desert soils, create human waste concerns, and cause conflicts with other users attempting to enjoy a quiet desert experience.

As an interest group, we have long been involved in planning and management of Indian Creek camping opportunities such as providing resources for group campgrounds and protecting more remote dispersed camping experiences. In 2020, the Climbing Organizations funded an inventory of all dispersed sites in the Indian Creek Corridor and beyond to assess the location, characteristics, impacts, and changes over time¹⁰ Changes to campsite locations and impacts were compared over time with a previous inventory completed by Rocky Mountain Field Institute (RMFI) in 2002.¹¹ Based on this assessment, we support a limitation on new dispersed camping developments in the Indian Creek Corridor. This means transitioning to a "designated dispersed" camping setup, where dispersed camping is only allowed at specified sites.. For such a system to be feasible, planners should ensure that there are enough camping locations (both developed and designated dispersed) to accommodate demand so as to limit any impacts from unmanaged camping. And BLM will have to fund adequate signage and education of this new policy.

¹⁰ Nelson, Rachel. February, 2021. Dispersed Campsite Inventory and Assessment in Indian Creek Canyon, Utah. Prepared by the Access Fund and Friends of Indian Creek. Unpublished.

¹¹ Hesse, Mark and Thayer, Christina. January 2002. Recreation Inventory and Report: Rock Climbing and Related Activities in Indian Creek Canyon, Utah. Prepared by Rocky Mountain Field Institute. Unpublished.

As noted in the Access Fund's 2015 comments to the BLM Monticello Field Office's *Draft Business Plan for BLM Monticello Field Office Campgrounds*, the Climbing Organizations recognize that most Indian Creek visitors are rock climbers, and that increased visitation necessitates higher levels of management than in the past. We believe that any new fees for developed camping should be commensurate with similar campgrounds in the area, and that it is also important to provide free designated dispersed camping experiences at more remote sites within the Indian Creek corridor. Managers should consider requiring best practice camping at designated dispersed sites, including camp toilets and fire pans. A designated and hardened overflow camping area for vehicles, such as camper vans, would also minimize impacts. An ad-hoc version of this has been created by users approximately ¼ mile south of the Hamburger Rock Campground, which allows campers to walk to the restroom facilities at Hamburger Rock.

This monument plan should consider what future campground needs might be necessary and determine whether existing group sites should be expanded such as at Hamburger Rock, or new campgrounds established such as at the already-authorized Shaw Mountain Vista Campground. Central to the work during the 2004 Indian Creek Activity Plan was to plan for large group sites and designate a range of other camping experiences such as smaller campgrounds and designated dispersed sites that provide much more solitude than the group camping areas. This plan should continue that effort to provide for a range of camping experiences throughout the BENM while clustering most of the camping at specific locations (i.e., Superbowl and Creek Pasture campgrounds) to protect the undeveloped character of Indian Creek and BENM as a whole. We believe that this plan should establish a process in collaboration with tribes, the climbing community and other stakeholders for assessing long-term needs, considering if and where new campgrounds should be established, and for limiting any new dispersed camping sites while signing the specific locations for acceptable designated dispersed camping locations at Indian Creek and throughout BENM.

2. Human & Pet Waste

A primary consideration for managing campers, as well as all visitors, throughout BENM is providing adequate human waste facilities. Ensuring appropriate human waste management has been a longstanding project for the Climbing Organizations. Following a temporary "WAG bag" program instigated in 2004, we have contributed significant investments for the construction and management of toilets throughout the Indian Creek corridor. This plan should consider additional human waste management needs given current and projected use levels and patterns both at Indian Creek and elsewhere in the BENM. As in the past, Climbing Organizations and our partners stand ready to help the BLM plan and fund human-waste management projects, as well as educational campaigns that encourage all users in BENM to "pack out your poop."

Based on the above-mentioned camping survey, we have identified a more common problem of pet waste at camping areas, as well as at climbing cliffs. While the Climbing Organizations continue to educate the climbing public as to the current policy whereby human waste may sometimes be buried when necessary (the rule is pack out all waste,

bring wags bags to the crags, and use toilets); however, all pet waste must be packed out. To reinforce these rules and improve human and pet waste management, educational campaigns should be considered in this plan.

3. Trails & Trailheads

Established, designated and well built trails serve many beneficial purposes in managing and limiting impacts from climbing. Such trails can prevent erosion, route climbers away from sensitive resources, such as archaeological sites, and make approaches. The climbing community has dedicated at least 5,000 hours to building and maintaining trails to popular climbing cliffs at Indian Creek including approximately 4 miles of trail at 8 different climbing destinations: 4x4 Wall, Blue gamma, Supercrack, Chocolate Corner, Generic Crack, Battle of the Bulge, Scarface, Pistol Whipped and others. Ongoing trail work continues at Sparks Wall, Cat Wall and The Fin however, a number of popular cliffs still do not have officially designated or professionally designed trails.

This plan should consider non-motorized recreation access trails that may not be included in existing transportation plans (“motorized and non-mechanized vehicle use on roads and trails”) required by Proclamations 9558.¹² Key trails include the many climbing access trails throughout the Indian Creek corridor, as well as hiking and equestrian trails throughout BENM. Visitation continues to increase at Indian Creek. Accordingly, the Climbing Organizations continue to work alongside the BLM and other stakeholders to prevent erosion and protect and enhance climbing trails.

In addition to approach trails themselves, trailheads are also important for minimizing user conflicts and improving safety. In the upper Indian Creek Canyon a number of climbing cliffs have no well defined parking area, often creating a roadside parking issue. This plan should plan for parking at popular climbing access trailheads, designate formal parking locations, and decommission redundant or dangerous parking locations. Of particular concern are the Blue Gamma, Nuclear Wall, and Scarface parking areas.

4. Climbing Management

The Climbing Organizations recognize the need for a range of climbing management initiatives related to visitor use impacts, and cultural and natural resource protection. The Climbing Organizations propose a specific management construct for climbing within the monument with respect to the establishment of new climbing routes. Because the vast majority of climbing occurs in the Indian Creek Corridor, we propose that the boundaries of the Indian Creek Special Recreation Management Area—with a few modifications noted¹³ below—be designated a climbing focus area or recreation management zone (RMZ) where new climbing routes are programmatically authorized and may be

¹² Presidential Proclamation 9558 -- Establishment of the Bears Ears National Monument, found at <https://obamawhitehouse.archives.gov/the-press-office/2016/12/28/proclamation-establishment-bears-ears-national-monument>.

¹³ For this proposed climbing focus areas based on the existing Indian Creek SRMA boundaries, we propose that both Shay Canyon and Titus Canyon be removed from the focus area, and the entirety of the Harts Draw drainage be added to the focus area.

established by climbers so long as there are no conflicts with cultural/natural resources, or private property interests. For the balance of BENM, it may be appropriate to require prior authorization from BLM before new routes may be established, which may be addressed through the step-down management process discussed in the BLM's BENM scoping materials. In relation to development of new routes, the Climbing Organizations support robust education initiatives to encourage climbers to use best practices, such as camouflage of anchors and avoiding any impacts to cultural and paleontological sites.

We encourage the BLM and Tribal interests to work with the Climbing Organizations to develop an efficient authorization process that can protect valuable cultural and natural resources while also preserving unparalleled opportunities for unique climbing experiences throughout BENM at locations such as Valley of the Gods and Arch Canyon. The authorization process could range from programmatic to case-by-case, depending on the geographic area, existence of cultural and paleontological surveys, conditions and application. While a new route authorization process is being developed, the monument managers for BENM should have the authority to approve new route requests expeditiously. It is important to note that in more remote areas of Bears Ears National Monument, it may not always be apparent whether a climber is or is not on an existing route because climber visitation is so low in those more remote and less frequented areas of BENM. Therefore, we encourage BLM's management policy to recognize this fact and allow for exploration and adventure that characterizes this type of backcountry recreation.

The Climbing Organizations also support BLM retaining and exercising its authority to restrict certain areas to climbing to protect cultural resources –for example Shay Canyon within the Indian Creek Corridor– that are well documented and require mitigation. There may also be individual climbing routes at established walls within the Indian Creek corridor that should be closed to protect individual cultural resources. From the scoping materials, it appears that BLM intends to make these kinds of site-specific decisions as part of the implementation phase in its step-down management approach. We are therefore unclear at this point whether these decisions would be made in the RMP or in a subsequent climbing management plan focused on the Indian Creek corridor, but we encourage BLM to partner with our organizations to facilitate and allow for collaborative public participation in making these site-specific management decisions that involve closures or restrictions because we believe the climbing community will largely support them with proper public engagement, which will also lead to better compliance and outcomes.

Cliff nesting raptors in the Indian Creek corridor have precipitated seasonal climbing closures to accommodate nesting cycles. These closures have been publicized by the BLM, climbing group websites and other publications, and compliance has been very high. By all accounts this program has been a success and the Climbing Organizations support the continuance of this system and encourage funding of scientists with adequate administrative oversight to complete nesting surveys and expeditious management of closures.

Bears Ears National Monument hosts many quality and highly valued climbing locations outside of the Indian Creek Corridor, such as the Valley of The Gods, Harts Draw, Comb Ridge, and Lockhart Basin. Arch and Texas Canyons in particular represent some of Utah's wildest and most remote climbing locations. These climbing experiences require arduous technical approach hikes and difficult multi-pitch tower climbs, including Dreamspeaker, Angel Arch, Lone Star, and Texas Tower (one of the tallest desert towers on the Colorado Plateau), which inherently limit the number of climbers interested in and able to access these locations. In addition to the wild climbing opportunities found at Arch Canyon, Proclamation 9681 recognizes the numerous paleontological fossils from the Permian and Upper Permian eras, and cliff dwellings hidden throughout the canyon from the Pueblo II and III periods containing pictographs and petroglyphs ranging from the Archaic to the historic periods. Accordingly, the plan, especially the travel management provisions, should prioritize retaining the primitive nature of this canyon to protect these important cultural and conservation values and backcountry recreational opportunities.

5. Education

The Climbing Organizations acknowledge that climbing has impacts on the environment, and education and stewardship are the best strategies to resolve climbing-related impacts. The Climbing Organizations work with local climbing communities all across the country to develop long-term stewardship plans that sustainably manage impacts—like climber traffic, human waste, and trash—and assure the integrity of our climbing landscapes. In addition, the Access Fund Conservation Team and Indian Creek Climber Stewards provide leadership, expertise, and inspiration to ensure that climbing areas across the country are sustainably cared for. The Climbing Organizations have spearheaded climber education signs, stewardship projects and other necessary educational efforts to protect the fragile Indian Creek environment and climbing experience. This plan should outline education needs and potential partnerships that can effectively develop and publish educational materials to prevent recreational user impacts, while also providing interpretative information describing the area's unique geology, cultural history and natural environment.

6. Partnerships

To address stewardship challenges and the management of climbing, camping, trails, cultural resource protection, and natural resource protection, the Climbing Organizations have partnered with many different organizations and entities for multiple decades. These include the Bears Ears Inter-Tribal Coalition, Rocky Mountain Field Institute, Colorado College, Bureau of Land Management, US Forest Service, and many others. A key partner has always been The Nature Conservancy (TNC) and the Canyonlands Research Center who we have worked with to address the best ways to educate climbers as to the sensitive resources of the region, and proactively manage climbing and camping activity in the area to prevent any user conflicts and problems related to the Dugout Ranch cattle operation. For the last several years the Climbing Organizations have been meeting multiple times per year with TNC to develop a visioning process for Indian Creek that

will protect its natural undeveloped character while also assisting the BLM with its management challenges and obligations.

7. Preliminary Alternative Concepts

In its “Analysis of the Management Situation” for Bears Ears National Monument, the BLM outlined preliminary action alternative concepts designed to provide different strategies that address management issues and conflicts. For this plan, the Climbing Organizations support a climbing management approach that ensures consistency with the protection of the objects and values. Restrictions on recreation should be considered only if necessary for or to benefit the protection of the objects and values for which the monument was established. Recreation management approaches should provide for more developed forms of recreation in the frontcountry and more primitive forms of recreation in the backcountry. In all cases, management should provide for outcomes-based recreational experiences while protecting, restoring, and/or increasing resiliency of BENM objects and values. Recreation management zones should include areas in which recreational facilities may be developed to meet sustainable recreational needs.

* * *

The Climbing Organizations appreciate the BLM’s efforts to develop a balanced management plan for BENM that protects the unique and important objects of historic and scientific interest, while also providing opportunities for the world-class outdoor recreation. We look forward to working with the BLM, Tribes and other stakeholders to develop an appropriate, effective and durable plan for BENM.

Sincerely,



Erik Murdock, PhD
Vice President of Policy & Government Affairs
Access Fund



Taylor Luneau
Policy Director
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Rachel Nelson
President
Friends of Indian Creek

cc: Bears Ears Inter-Tribal Coalition