



June 30, 2020

Bureau of Land Management  
82 E. Dogwood Ave.  
Moab, UT 84532  
Attn: Mineral-Hell Roaring  
Via email: [kstevens@blm.gov](mailto:kstevens@blm.gov), [priddle@blm.gov](mailto:priddle@blm.gov)

**RE: Access Fund, Friends of Indian Creek, Salt Lake Climbers Alliance Comments on Proposal Limiting Roped and Aerial Activities in Mineral and Hell Roaring Canyons**

BLM Planners:

Access Fund, Salt Lake Climbers Alliance, and Friends of Indian Creek (the “Climbing Organizations”) appreciate this opportunity to provide scoping comments to the Bureau of Land Management (BLM) proposal limiting roped and aerial recreation activities in Mineral and Hell Roaring Canyons. If implemented, the proposal would place access restrictions on a 10,000 acre area in Mineral and Hell Roaring Canyons on roped and aerial recreational activities, including rock climbing, to protect golden eagles, Mexican Spotted Owl, desert bighorn sheep, and other wildlife.

The Climbing Organizations support science-based, adaptive, effective management strategies that protect sensitive wildlife habitat. Access Fund is a leading recreation voice that works across the country to educate climbers and develop reasonable and effective prescriptions that maintain climbing opportunities while ensuring the integrity of important wildlife habitat and other sensitive resources. However, as outlined in the BLM press release dated May 29, 2020, we believe this proposal is unsubstantiated, overbroad and unfairly restricts climbing activities without a demonstration that a permanent year-round climbing prohibition is necessary. We urge the BLM to continue its work with the Climbing Organizations to develop a tailored, site-specific proposal that maintains climbing opportunities while protecting the wildlife habitat for golden eagles, Mexican Spotted Owl, desert bighorn sheep.

**Climbing Organizations**

The Access Fund is the national advocacy organization whose mission keeps climbing areas open and conserves 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 advocacy organization with nearly 20,000 members and 130 affiliates.

The Salt Lake Climbers Alliance (SLCA) is a 501(c)(3) non-profit organization that exists to provide a unified voice for climbers in Utah’s Wasatch area through advocacy, stewardship, community, and education. The public land affected by this proposal includes significant

traditional backcountry climbing areas, particularly in Hell Roaring Canyon, and is visited by SLCA members.

The Friends of Indian Creek (FOIC), a 501(c)(3) organization, works with land managers in the Moab area to promote responsible climbing, and provide resources that help alleviate recreation's impact throughout southeastern Utah. Founded in 2005, 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.

Climbers and their representative organizations have a long tradition of respecting seasonal avian and other wildlife closures. The Access Fund in particular has facilitated research on raptor/climber interactions, and launched a nationwide educational campaign aimed at encouraging climbers to respect wildlife closures (see infographic below). Our organizations post seasonal closures and avoidance areas along with the expectation that climbers will comply. The effect has been a change in the culture of climbing, and resulting compliance, as climbing enthusiasts become stewards of the landscapes they love.

**SHARING the CLIFFS with RAPTORS**

Raptors are most vulnerable during reproductive season and are easily stressed when humans are near their nests. Climbers can help protect raptors by knowing some basic facts about the nesting season and respecting closures.

Late Winter	Early Spring	Late Spring	Summer
Raptor pairs set up breeding territory, nest site, and mate.	Both adults incubate the eggs, which takes 30+ days.	Adults protect and feed chicks, who can take 6-7 weeks to learn to fly.	Chicks learn to fly on their own, but adults still supply food.
! If disturbed, raptors may not select a breeding site.	! If disturbed, adults may leave the nest and eggs are vulnerable to exposure and predators	! If disturbed, adults are forced to defend their nests and could provide young with less food. Stressed chicks may force fledge.	! Disturbance sensitivity is decreasing. Chicks are less and less dependent on nest site.

\*Climbing can resume after chicks have successfully fledged. Specific breeding dates vary by species and by region. Check with land managers in your area for regional closures.

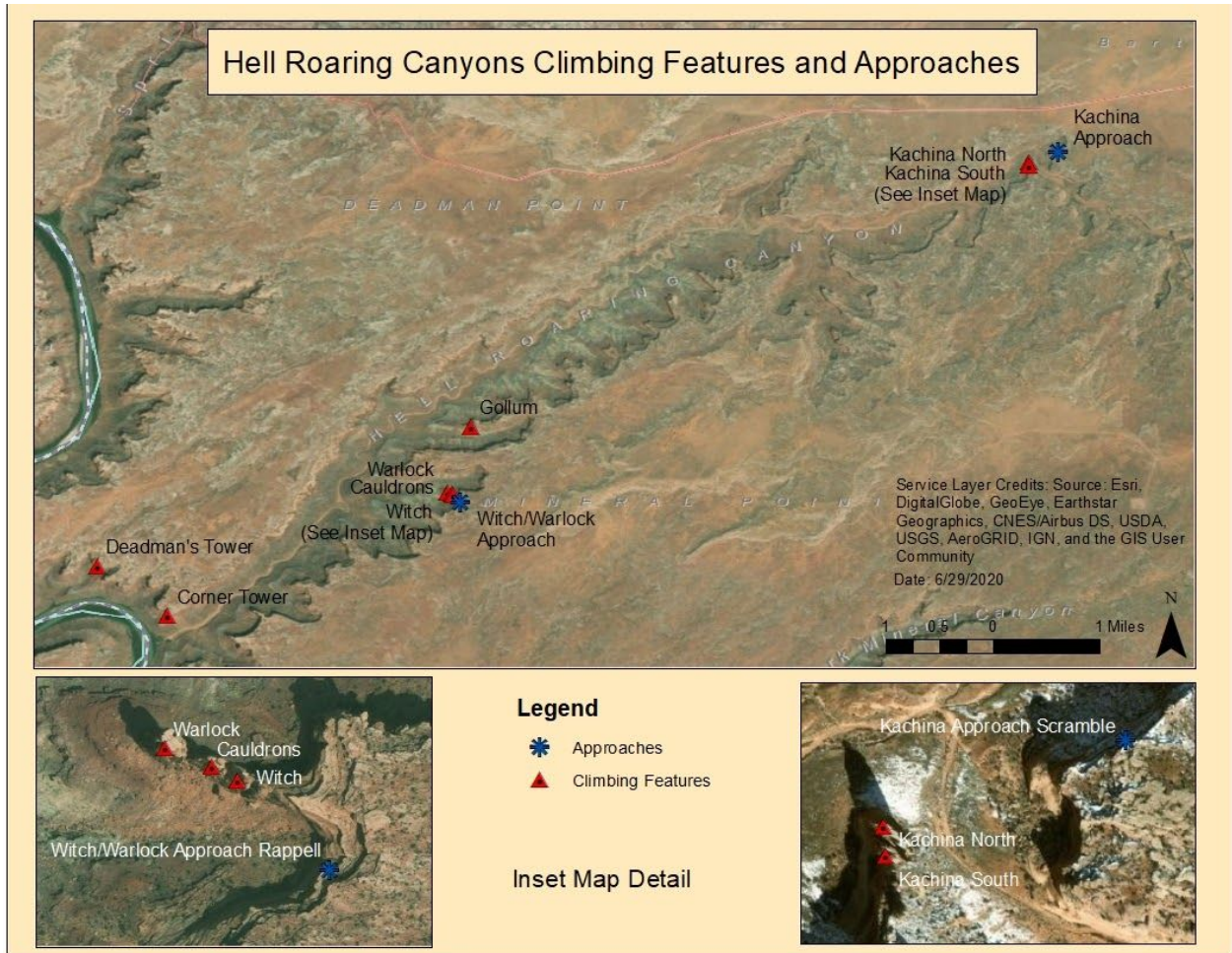
**HAWK WATCH**  
Conserving Raptors and Our Shared Environment

**ACCESS FUND**  
Protect America's Climbing

## **Mineral Canyon and Hell Roaring Canyon Climbing Locations**

Although there are climbing sites in Mineral Canyon, by far most of the climbing affected by this proposal is located in Hell Roaring Canyon, including: Corner Tower -near the mouth of the canyon, Warlock, Witch, The Cauldron, Gollum -about 2 ½ miles up from the mouth of the canyon on the southeast side; and the North and South Kachina Spires -near the head of the canyon (see map below). There are more climbs at various locations throughout Hell Roaring Canyon, but location data for those climbs is currently unavailable. Given the sensitivity of this area, it is important for the BLM to understand the nature of traditional climbing and how it differs from other roped and aerial activities (behavior patterns and visitor-use levels).

Though we do not have any specific visitor-use data, discussions within the climbing community have indicated the area receives fewer than 50 parties a year -- possibly fewer than 25. The routes listed in the guidebooks and on [mountainproject.com](http://mountainproject.com) are mostly difficult and remote, requiring an advanced level of skill and commitment. The majority of the climbs are towers, and as such do not attract large "cragging" groups like you would find on Wall Street/Potash Road or even Indian Creek. Parties within the area are typically small, 2-3 people on average, in order to most efficiently summit and descend the towers. Probably the most visited of these climbs in the Witch/Warlock group – which is approached typically via rappel from the adjacent rim, although sometimes this area is approached hiking from the mouth of the canyon. The Kachina Spires is probably the second-most visited climbing area in Hell Roaring Canyon, which is approached usually via a scrambling ledge-route close to the towers which is also used by hikers visiting a pictograph panel just down canyon from the spires.



## Climbing and Wildlife in Hell Roaring Canyon

We support a science-based approach to climbing restrictions. Typically, a potential avian site is closed temporarily during the beginning of the nesting season, then reopened after the birds fledge, or it becomes apparent the nesting site is unoccupied. Climbers across the country exhibit extremely high compliance rates for seasonal, science-based raptor closures. This is why we are especially concerned about this BLM proposal that potentially limits rock climbing activities on the entire 10,000 acres for a year-round ban. If these blanket spatial and temporal limitations are applied as proposed, it would be unprecedented.

Desert bighorn are susceptible to surprise encounters from recreation groups which can result in the limitation of the bighorns' escape routes and access to water sources. To the best of our knowledge, there are no studies pertaining to the impacts of rock climbing on bighorn sheep in Hell Roaring Canyon. Without these studies, the impact of climbing on the population of desert bighorn sheep in Hell Roaring Canyon is largely unknown. Mapping site-specific bighorn escape routes and water sources is essential to understanding the site-specific relationships between bighorn sheep and rock climbing activities in Hell Roaring Canyon. The BLM's "Moab BLM Wildlife" powerpoint presentation shared with Access Fund in June, 2020 references two

Masters Theses, but neither study examines rock climbing activities (the studies focus on motorized vehicles, hikers and mountain bikers) or Hell Roaring Canyon specifically. The studies do acknowledge that bighorn sheep could benefit from seasonal restrictions, not permanent, year round closures.

The BLM's powerpoint presentation on desert bighorn also indicates that past factors contributing to bighorn decline is not infrequent, low impact climbing, but rather competition with domestic livestock for forage and space, vulnerability to domestic livestock diseases, habitat conversions native grasslands to shrub lands, excessive grazing & fire suppression, and unregulated hunting. Indeed, this same study concluded that "human activity is extremely seasonal." Likewise, Utah DWR also identifies a number of other "range-wide issues" (none which include low impact rock climbing) for the bighorn such as disease, habitat degradation and loss, predation, poaching, and competition from domestic livestock.

Lastly, the BLM powerpoint highlights highline and BASE activities several times, but does not once illustrate or reference rock climbing impacts (the presentation does share raptor closure signage) because the visitation levels and behavior patterns are fundamentally dissimilar to BASE and highline activities. The BLM should not lump rock climbing into the general category "Roped Activities" because it is abundantly clear that different activities (that happen to use ropes) necessitate different management strategies and restrictions with regard to wildlife.

### **Inappropriate Predetermination**

The press release announcing this closure appears pre-decisional and is not well substantiated. For example, climbers need to know if there are studies and surveys demonstrating that BLM has data to substantiate a precedent-setting rock climbing restriction. Two, climbers are lumped together with other activities that exhibit substantially different behavior patterns and use-levels. Traditional backcountry rock climbing has a long history in this area, while BASE jumping and highlining has mostly grown in frequency in the area over the last 10-15 years. Moreover, most of the BASE and highlining activity occurs in Mineral Canyon, so it is incongruous that rock climbing be restricted the same way as these other activities that are demonstrably more disruptive and often include large groups. And three, the BLM's press release conflates several different sensitive species to justify a year-round closure. Our experience indicates that each of these species has a different management strategy - a proposal needs to identify the temporaspatial management justification for each species independently.

With this in mind, we believe that the BLM should 1) not prescribe a blanket prohibition without a scoping period and draft Environmental Assessment, 2) conduct a site specific scientific analysis of wildlife and social conditions, and 3) develop management alternatives as per the National Environmental Policy Act before promoting an unsubstantiated management prescription without public input. As climbing advocacy and stewardship organizations, we strive to balance recreation access with resource protection. We encourage you to follow the

standards that have been in place for many years by following a science-based approach that protects sensitive habitat during sensitive times, versus a blanket closure.

Sincerely,



Erik Murdock, PhD  
Policy Director  
Access Fund



Julia Geisler  
Executive Director  
Salt Lake Climbers Alliance



Rachel Nelson  
President  
Friends of Indian Creek

cc:

Jason Kieth, Access Fund