



08/28/13

Sendi Kalcic, Wilderness Specialist
Bureau of Land Management
4701 N. Torrey Pines Dr.
Las Vegas, NV 89130
lvwilderness@blm.gov

Re: American Mountain Guides Association, Las Vegas Climber's Liaison Council, and Access Fund Comments on the Draft Wilderness Management Plan and Environmental Assessment for the Rainbow Mountain Wilderness and La Madre Mountain Wilderness

Dear Ms. Kalcic and Wilderness Planning Team:

The American Mountain Guides Association (AMGA), the Las Vegas Climber's Liaison Council (LVCLC), and the Access Fund (AF) welcome the chance to provide comments on the Draft Wilderness Management Plan and Environmental Assessment for the Rainbow Mountain Wilderness and La Madre Mountain Wilderness (the plan). We support the Proposed Action with a few modifications. This plan provides important direction for these wildernesses that provide world-class climbing and other recreational opportunities in Red Rock Canyon National Conservation Area (RRCNCA).

About the Organizations

The American Mountain Guides Association, the Las Vegas Climber's Liaison Council, and the Access Fund are national and Nevada-based climbing advocacy organizations dedicated to climbing access, conservation, advancing the climbing culture, and advocating for American climbers. For more about us, see <http://www.amga.com>, <http://www.lvclimberscouncil.org>, and <http://www.accessfund.org>.

Comments

Given that our organizations support outstanding opportunities for climbing recreation for both the self-guided and guided public, our comments are primarily directed to those opportunities, and actions that facilitate them. We support the trail actions and signage actions outlined in the proposed action. We appreciate the recognition given to the visitor-worn paths that access particular climbing areas, and the options given to managing them, especially the potential for designation or other official recognition of said paths. We believe that the preservation of wilderness character and the wilderness resource calls for a slightly greater degree of trail management in the front-country interface area on both sides of the wilderness boundary, primarily in popular destinations in the Rainbow Mountain Wilderness. The designation of a few additional trails, which are currently existing visitor-worn paths, will serve to protect the resource by reducing trail braiding and erosion caused by ambiguity within the existing trail system. Minimal signage in this area would also serve to assist in this goal.

We support the legal use of a minimal number of fixed anchors as a necessary tool for wilderness climbing, and have submitted comments to that effect in response to scoping for the Resource Management Plan (RMP) fixed anchor amendment process. We look forward to continued participation in that process.

We support continued opportunities for the public to access the wilderness with a professional, credentialed guide should they so choose. The opportunities outlined in the RMP are adequate, and we are glad to see the plan recognize the value of guides as a resource for education in high standard climbing practices and wilderness ethics.

One question we have is about the Plan Evaluation. Under "Ongoing Activities", one bullet point is "Inspecting climbing bolts for wear and possible replacement". Is this something the BLM plans on actively monitoring? We believe that the climbing community, in collaboration with the LVCLC, should take responsibility for the maintenance of fixed anchors as described in the BLM-LVCLC Rebolting Guidelines.

Specific Recommendations

We have two specific sections of trail that we believe should be added to the designated trail system in RRCNCA. The first is the Straight Shooter trail. This trail was constructed by the BLM and LVCLC in a state park inholding in Pine Creek Canyon during 2003-2004. It served to consolidate impact, and drastically reduced the existing trail braiding and erosion. When the inholding was absorbed into the NCA, no action was taken to officially incorporate the trail into the NCA trail system. The trail breaks off the Pine Creek loop outside of the wilderness, and enters the wilderness for approximately 200m up to the Straight Shooter wall. As it is a constructed trail up a steep slope, it is in need of maintenance, due to erosion of some of the steps. On 10/04/11, the LVCLC sent a letter to the BLM, requesting that this trail be designated. The letter is attached to these comments.

The second visitor-worn path seamlessly leaves the designated Pine Creek Loop just prior to the wilderness boundary. After entering the wilderness, one branch briefly crosses the wash and traverses underneath the Mescalito formation into the south fork of Pine Creek, where it reenters the wash. This path, and several short spurs, serves as access routes for the east face of Mescalito and the popular route Cat in the Hat. The second branch goes into the north fork of Pine Creek, and enters the wash by the climbing route Dark Shadows. Along the way, there are numerous braided segments causing significant erosion due to the lack of a well-defined trail. BLM staff and LVCLC volunteers surveyed these paths in 2011; with the intent of cataloguing what restoration work could be done. However, given the level of erosion and the popularity of these paths with both hikers and climbers, we believe that both visitors and the resource would benefit from the possibility of increased maintenance, and that these paths should be designated as trails to the point where they reenter the washes in their respective branches. There has been volunteer interest in maintaining all of these trail sections through the LVCLC, and we would greatly appreciate the opportunity to help.

Conclusion

Our organizations appreciate the chance to provide input to BLM planners in this process. We hope our suggestions are helpful to both the climbing community and public recreationists as a whole, as well as serving to protect the amazing character of the Rainbow Mountain and La Madre Mountain Wildernesses. We thank the BLM for their work managing this outstanding slice of our American public lands. Please contact any of the undersigned with any questions or concerns raised in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Massey". The signature is fluid and cursive, with the first name "Scott" being more prominent than the last name "Massey".

Scott Massey
Outreach and Advocacy Director
American Mountain Guides Association
scott@amga.com

/s Xavier Wasiak

Xavier Wasiak
President
Las Vegas Climbers Liaison Council
xavierwasiak@live.com

A handwritten signature in black ink, appearing to read 'R.D. Pascoe', with a long horizontal flourish extending to the right.

R.D. Pascoe
Policy Director
Access Fund
rd@accessfund.org

Copy of letter sent October 4, 2011

Las Vegas Climbers Liaison Council
8221 W. Charleston Blvd. #106
Las Vegas, NV 89117

Bureau of Land Management
Red Rock Field Office
Las Vegas, NV
Attn: Nick Walendziak, Recreation Planner, Climbing Lead

Dear Nick:

I am writing a formal request, on the behalf of the Las Vegas Climbers Liaison Council (LVCLC), to include the path known to climbers and hikers as the "Straight Shooter trail" in the official system of trails in the Red Rock Canyon NCA.

The Straight Shooter trail was constructed in the fall of 2003 and 2004, as a service project of the LVCLC and local climbers. It is located in a parcel of land in Pine Creek Canyon that was formerly owned by the Nevada State Park system, but was transferred to the BLM several years ago. As the path was constructed in an inholding, it was not included in the Wilderness designation of 2002. This path accesses several major cold-weather traditional climbing crags in the Pine Creek area, including: Straight Shooter Wall, Stick Gully, Beer and Ice Gully, and the Brass Wall. It was originally constructed as a means of consolidating traffic in the fragile desert ecosystem. At that time, there was a maze of braided user-created footpaths in the vicinity. In the intervening years, it proved to be very effective in consolidating user traffic, allowing many of the former paths to revegetate and disappear.

Like many of the trails and paths in Red Rock Canyon, sections of this trail are beginning to deteriorate due to erosion and traffic. It is the request of the LVCLC to make this an official trail, in whatever capacity that may be, so that we can perform vital maintenance in order to keep the trail intact. We believe that a well-maintained trail here, as evidenced in the past decade, will properly consolidate use and minimize resource damage. Letting the path continue to deteriorate will disperse traffic, reversing the original intent. Since this was originally a project of the LVCLC, we would like to continue the maintenance, but wished to ensure that the proper procedures were followed in the wake of the ownership transfer.

I realize that this request will probably be addressed by the proposed Climbing Management Plan, and as such, is not an immediate priority to fulfill. In the meantime, the LVCLC requests permission to address trail maintenance issues in a timely manner. Thank you very much for your time. I look forward to discussing this matter with you.

Sincerely,



Scott Massey
Vice-President
Las Vegas Climbers Liaison Council