



Protect America's Climbing

September 6, 2013

Kezia Nielsen
Virgin River Comprehensive
Management Plan / Environmental
Assessment
Zion National Park
Springdale, UT 84767

**RE: Access Fund Comments to the Virgin River Comprehensive Management Plan /
Environmental Assessment**

Dear Zion Planning Team:

The Access Fund welcomes the opportunity to submit these comments to the National Park Service's (NPS) Virgin River Comprehensive Management Plan ("Plan" or "Draft CMP"). We provide these comments to assist Zion National Park (ZNP) planners in developing appropriate and effective alternatives for the CMP. The Access Fund appreciates the extensive work that Zion planners put into this Draft CMP. While we have suggestions to improve the Plan, we believe that much of the analysis and proposed actions in this Draft Plan are appropriate actions to protect and enhance the outstandingly remarkable values of the Virgin Wild and Scenic River.

The Access Fund

The Access Fund is the national advocacy organization that keeps U.S. climbing areas open and conserves the climbing environment. Founded in 1991, the Access Fund supports and represents over 2.3 million climbers nationwide in all forms of climbing: rock, ice, mountaineering, and bouldering. Six core programs support the mission on national and local levels: Climbing Management Policy, Local Support & Mobilization, Stewardship & Conservation, Land Acquisition & Protection, Risk Management & Landowner Support, and Education. The Access Fund has a long history of participation in Zion National Park management initiatives,¹ and we welcome this additional opportunity to participate in the development of the CMP. Utah is one of our largest members states and many of our members travel regularly to climb in Zion National Park. To learn more, visit www.accessfund.org.

COMMENTS

The Access Fund supports the overall framework of the Virgin River Comprehensive Management Plan, in particular Preferred Alternative C with the specific modifications noted herein, because this proposal provides a realistic framework for protecting river values to achieve the purposes of the Wild and Scenic Rivers Act (WSRA) while preserving important recreation opportunities in accordance with NPS policies. We also support the structure of the Plan, which provides broad-based strategies that apply across the entire wild and scenic river designation, with specific management strategies for each of the designated wild and scenic river segment and associated tributaries.

In general, we support Alternative C because it retains resource-based recreation opportunities in Zion National Park, proposes various needed river restoration actions and effective trails improvements, and provides for adaptive planning of visitor use management. Alternative C is also aligned with the management objective for recreation in the Plan and NPS policy in that it would bring more park visitors into close association with park resources while protecting and enhancing the many outstandingly remarkable values in the planning area. However, we have suggestions in some areas that we believe will improve the Plan. These comments are limited to the Plan's proposals for Virgin River in Zion National Park.

FIXED ANCHORS

Climbers have a unique and special relationship to Zion National Park because Zion is one of the premier climbing destinations in the world. Climbers come here from around the globe to challenge themselves on the park's sandstone walls where the climbing possibilities are nearly limitless and the quality of the routes generally very high. Because of the rock type and the scale of the cliffs in Zion, we believe that some level of fixed anchor use must be allowed wherever climbing is allowed. Nonetheless, the Access Fund agrees that fixed anchors should be placed judiciously and closely managed in order to prevent the degradation of wilderness resources and character.

The National Park Service's Director's Order 41 (DO #41) clarifies how climbing activities should be managed for wilderness, and the Draft CMP acknowledges that this direction would apply to segments of the river corridor that overlap with wilderness designations.² Director's Order 41 specifies that "climbing management strategies will address ways to control, and in some cases reduce, the number of fixed anchors to protect park wilderness resources or to preserve the 'untrammled,' 'undeveloped,' and 'outstanding opportunities for solitude' qualities of the park's wilderness character."

The Access Fund supports the proposal in the Plan that allows for the infrequent placement of fixed anchors. This is consistent with the acknowledgement in Director's Order #41 that the

“occasional placement of a fixed anchor“ is not incompatible with wilderness.³ The Draft Plan states that

The placement of new fixed anchors may be allowed when necessary to enable a safe rappel when no other means of descent is possible, to enable emergency retreat, during self-rescue situations. The infrequent placement of new fixed anchors is allowed when ascending a route to connect terrain that is otherwise protected by removable anchors (e.g., one crack system or other natural feature to another) or when there are no features which will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during the ascent (e.g., traditional face climbing).⁴

We support this programmatic authorization of new fixed anchors in the Virgin Wild and Scenic River planning area which we believe is consistent with the standards for wilderness climbing management found in DO #41. We also support the following provisions in the Draft CMP that closely follow the framework set out in DO #41:

- Fixed anchors (e.g., webbing, bolts, pitons, chains) currently in place may remain.
- New, bolt intensive climbing routes (e.g., sport climbs, bolt ladders) are not appropriate in wilderness and should not be created.
- Fixed anchors should not be placed merely for convenience or to make an “unclimbable” route climbable.
- When a climber determines the need for anchor placement or replacement, this must be accomplished in compliance with regulated and permitted standards (e.g., power drills prohibited).

Importantly, ZNP proposes an adaptive management approach for regulating new fixed anchors: “At this time there is no permit or approval system in place, or proposed, with regard to the placement of fixed anchors; however, one may be developed and implemented if the park determines it is necessary, through research and monitoring, to protect natural and cultural resources.”⁵ If Zion National Park decides to develop and implement a specific authorization process with regard to the placement of new fixed anchors, we welcome the opportunity to participate in developing such a process. Meanwhile, the Access Fund will educate the climbers of clean climbing ethics to prevent unnecessary fixed anchors placement and to minimize impact to the climbing environment.⁶

PROTECTING AND ENHANCING THE VIRGIN RIVER SCENIC ORV

The Access Fund supports the Plan’s goal to preserve the “untrammelled, undeveloped, and outstanding opportunities for solitude” qualities of the park’s wilderness character. These qualities are important to climbers. The Draft CMP proposes to protect the scenic outstandingly remarkable values in the Virgin Wild and Scenic River planning area by, in part, by “reducing glare from climbing bolts and creating an authorization process for

climbing bolts according to Director's Order 41 ... which could be programmatic approval.”⁷

Under the Plan, the park would implement a new standard for climbing bolts in tributaries with scenic ORVs.⁸ However, we are concerned how the park might remove fixed anchors in select locations to protect these scenic values. It is unclear how these scenic river segments would be managed differently than other parts of the planning area, and if the park would eventually develop a specific fixed anchor authorization process for scenic segments. In short, how will the park determine which fixed anchors to remove from scenic segments:

- All of them? Only those most obvious fixed anchors?
- Will there be a process to determine which fixed anchors to remove?
- Will there be a notice mechanism to climbers (and possibly canyoneers) so that the public doesn't rely on the presence of anchors they may have used previously?

We believe that removal of bolts already in existence has significant consequences that the park should consider. First, bolts are placed to guarantee climbers' safety. While the Access Fund educates climbers to minimize the placement of fixed anchors and encourage the use of removable anchors when possible, there are certain situations where bolts are necessary to climb. Also, climbers and land managers increasingly use strategic bolt placements to protect sensitive resources such as cliff-edge vegetation, soils, and specimen cliff trees that might otherwise be directly used as rope anchors. The removal of bolts might not only impose new risks to climbers but also sacrifice the significant resource protection function that these anchors sometimes provide. We believe that the continued use of fixed anchors, if properly managed, will not degrade wilderness resources or scenic values. To minimize visual impacts and therefore enhance scenic ORVs within the river corridor, we suggest the following:

- Encourage climbers to use neutral or rock-colored stainless steel fixed anchors and corresponding hangers, rappel rings, quick links, and chains;
- Educate climbers of clean climbing ethics.⁹

CONCLUSION

The Access Fund hopes these comments to the Virgin River Comprehensive Management Plan assist Zion planners in refining the Preferred Alternative C. The Draft Plan proposes to protect and enhance many outstandingly remarkable values associated with the Virgin River, and increase the recreational opportunities in Zion National Park. We encourage planners to also protect and enhance access to the hundreds of specific climbing areas that lie in the planning area. Your decisions will be critical to the future experiences of thousands of climbers who travel to this world-class area every year. Thank you for considering the importance of Zion to climbers worldwide and for your hard work on this extensive and important planning process. If you have any questions or comments, please contact me at 435-709-8674 or Jason@accessfund.org.

Sincerely,



Jason Keith
Senior Policy Advisor
Access Fund

Cc: Southern Utah Climbers Alliance
American Canyoneers

¹ For example, see the Access Fund's Comments to 2007 Zion National Park Backcountry Management Plan/Environmental Assessment at

http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/UT--Zion_10_6.22.2007.pdf.

² See Draft CMP at 77.

³ See

<http://www.accessfund.org/atf/cf/%7B1f5726d5-6646-4050-aa6e-c275df6ca8e3%7D/DIRECTOR%27S%20ORDER%2041%20SIGNED%205.13.13.PDF> at Section 7.2.

⁴ Draft CMP at 200-201.

⁵ Id.

⁶ Although we support the CMP proposal as giving prior authorization to fixed anchors by zone on NPS wilderness, the language about case-by-case authorization on BLM lands still needs to be clarified. The plan states that on BLM lands:

ix. For members of the public, no exceptions to the prohibited uses found in section 4 (c) of the Wilderness Act, are allowed – including creating structures or installations – without explicit, case-by-case authorization from the BLM managing office. Unauthorized structures and installations will be dismantles or removed as soon as practicable.

Authorizations may be appropriate for:

- a. allowing the placement of permanent, fixed climbing anchors. The BLM will not authorize the public install permanent fixed anchors using motorized equipment. (USDI, BLM, 6340.

See Draft CMP at p. 201.

⁷ See Draft CMP at 86. This action is authorized by the language in Director's Order 41 which specifies that "climbing management strategies will address ways to control, and in some cases reduce, the number of fixed anchors to protect the park's wilderness resources or to preserve the 'untrammled,' 'undeveloped,' and 'outstanding opportunities for solitude' qualities of the park's wilderness character."

⁸ See Draft CMP at 77.

⁹ For more suggestions how to manage the visual aspects of climbing, see our publication "Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan" at http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000789/k.F0FC/Climbing_Management.htm. Additional resources for land managers can be found at www.climbingmanagement.org.