

November 13, 2009

Mark Tanaka-Sanders
Bureau of Land Management
4701 North Torrey Pines Drive
Las Vegas Field Office
Las Vegas, Nevada 89130
E-mail: redrockbp@blm.gov

Re: Access Fund Comments to the Bureau of Land Management, Southern Nevada District Office, Fee Increase Proposal

Dear Mr. Tanaka-Sanders:

The Access Fund welcomes this opportunity to provide comments to the Bureau of Land Management's Red Rock Canyon National Conservation Area (RRNCA) regarding the fee increase proposal. We have concerns that not enough of the collected funds under the BLM's draft business plan for Red Rock Canyon are allocated for the conservation of resources and the purposes for which the NCA was established. More of these funds should go towards reducing congestion on the loop road, rehabilitation of overused trails, and a human waste removal program.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 15,000 members and affiliates. We advocate on behalf of approximately 1.6 million technical rock climbers and mountaineers nationwide.

The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment. Earlier this year, the Access Fund renewed a five-year memorandum of understanding with the BLM¹ to work cooperatively on climbing management and resource protection. To learn more about us, got to www.accessfund.org.

I. INTRODUCTION

The Access Fund has a proud record of conservation work and climber activism at RRNCA, and a significant number of our members climb regularly at Red Rocks. Given the significance of Red Rocks to the climbing community, the Access Fund supports reasonable and effective management policies for this area that benefit climbing opportunities while providing the BLM with effective guidance that protects RRNCA resources and values.

The Access Fund has assisted land management agencies in climbing management and general planning initiatives in the following ways:



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- Work with local climbing organizations such as the Las Vegas Climbers Liaison Council (<http://www.lvclc.org/>)
- Advice on visitation, use patterns, and climbing techniques and tools
- Helping conduct and/or undertake surveys of climbing activity to determine management preferences
- Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletters.
- The Access Fund Climbing Preservation Grant program provides funds for research, monitoring, educational outreach, and stewardship projects at climbing areas on an annual basis. Specific components of this Wilderness Plan may be appropriate for Access Fund grant support.

Draft Business Plan

It is unclear that funds collected under this business plan would go towards conserving and protecting the values for which the NCA was established. A National Conservation Area is an area of public land set aside “[i]n order to conserve, protect and enhance [the area] for the benefit and enjoyment of present and future generations.” In 1990, Congress declared the Red Rock Canyon area of southern Nevada to be a National Conservation Area, only the seventh to be designated nationally. As stated in its enabling legislation, the Red Rock Canyon NCA was created

In order to conserve, protect and enhance for the benefit and enjoyment of present and future generations the area in southern Nevada containing and surrounding the Red Rock Canyon and the unique and nationally important geologic, archeological, ecological, cultural, scenic, scientific, wildlife, riparian, wilderness, endangered species and recreation resources of the public lands therein contained, there is established the Red Rock Canyon National Conservation Area.

16 U.S.C. 460ccc et seq.



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The draft business plan primarily focuses on increasing fees for the long-term maintenance of BLM facilities/structures, not the geologic, natural, and cultural resource values outlined above. Little in this document refers to the extensive need for trail rehabilitation and a more effective solution to deter social trails. This is a major problem that needs to be addressed in the wilderness areas as well as the front country. Although there is money allocated to complete a comprehensive trail plan, there is no funding for trail rehabilitation.

According to the visitor satisfaction survey in the RRNCA Draft Business Plan, 94% of respondents were satisfied with the maintenance of the trails for non-motorized use. However, little is known of what trails the visitors used and how far they hiked. Main trails right next to the parking lot are very well maintained. The further away from the trail access points are where the trails deteriorate, causing erosion and trail braiding.

For several years now, the 13-mile loop has had major traffic congestion problem. In 2001 a transit feasibility study (Peccia and Associates 2001) was done in Red Rocks on the 13 mile loop. Since then no solution has been implemented and congestion is an ongoing problem during the peak of the visiting season. Signs addressing this problem such as, “slow traffic keep right,” would be instrumental in helping this problem. We applaud the BLM’s goal of adding better road signs.

The Access Fund applauds the BLM for including a section in the business plan for resource protection. A graffiti removal program, restoration of plants in disturbed areas, and eradication of non-native species is vital to the conservation of RRNCA. In addition to the BLM goals of providing more informational Kiosks, a kiosk that provided educational information on human waste removal and rest stop or wag bags would be effective in reducing the on-going human waste problem in the back country and in highly concentrated climbing areas. We strongly urge the BLM to work with the Las Vegas Climbers Liaison Council and the Friends of Red Rock Canyon to move forward in dealing with this problem.

Conclusion

Reducing congestion on the loop road, rehabilitating overused trails, and an initiative that removes human waste are important considerations when distributing future funds. We hope these comments are meaningful to the BLM and will be considered when moving forward in this process. Red Rock Canyon National Conservation Area is truly an international treasure, both as a climbing resource and as a recreation area.



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Best Regards,

A handwritten signature in black ink, which appears to read "Amy Ansari".

Amy Ansari
Grassroots Coordinator
The Access Fund

Cc LVCLC

¹ See <http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/AF%20BLM%20MOU.pdf>