



January 9, 2009

Bureau of Land Management
Grand Junction Field Office, Resource Management Plan
2815 H Road
Grand Junction, CO 81506,
Email: GJFO_RMP@blm.gov

**Re: Access Fund Scoping Comments to the Bureau of Land Management,
Resource Management RMP, Grand Junction Field Office Colorado**

BLM Planners:

The Access Fund welcomes this opportunity to provide scoping comments to the Bureau of Land Management's (BLM), Resource Management RMP (RMP) for Colorado's Grand Junction Field Office (GJFO). We applaud this effort to provide reasonable and effective management direction for 1.2 million acres of public land (surface) and 1.45 million acres of federal mineral estate (subsurface) administered by the BLM's Grand Junction Field Office.

This RMP planning effort will include recreation issues and related management strategies, as well as other management issues that affect recreation with the GJFO (such as energy development, wilderness, special designation areas, travel management, special status species management, and cultural resources). In addition to the management of climbing, we are concerned with how management choices related to these other management issues analyzed in the GJFO RMP could affect recreational rock climbing.

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 one million technical rock climbers and mountaineers nation-wide. Many of our members live and recreate in Colorado (our second-largest member state), and the Grand Junction area in particular

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. To learn more about the Access Fund, see www.accessfund.org.

An Access Fund affiliate—the Western Colorado Climbers Coalition (WCCC)¹—is a Grand Junction-based climbing organization dedicated to preserving access to Western Colorado's climbing areas through land stewardship, education and land use advocacy. Many areas of interest to Access Fund and Western Colorado Climbers Coalition members lie within the GJFO's management area for this RMP.

I. INTRODUCTION

The lands managed by the Grand Junction Field Office (“Grand Junction Field Office” or “GJFO”) have long been an outstanding destinations for rock climbing. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, unique climbing challenges, and convenient access from Grand Junction and the I-70 Corridor. Climbing sites in this management area include:²

- Rough Canyon (proposed Bangs Canyon Special Recreation Management Area and Rough Canyon ACEC)
- Bangs Canyon and bouldering along CO Highway 141 between Whitewater and Unaweep Canyon (proposed Bangs Canyon Special Recreation Management Area)
- Unaweep Canyon (including BLM lands that are adjacent to property owned by the Access Fund)
- The Palisade area north of Gateway (proposed The Palisade WSA)
- Scattered climbing locations along the Dolores River and CO Highway 141 south of Gateway
- Tower climbing and bouldering on the southern slopes of Mount Garfield near the trailhead access from I-70
- DeBeque Canyon along I-70 and its side-canyons

The Access Fund has a proud record of conservation work and climber activism at climbing locations around Grand Junction, and a significant number of our members climb regularly at places like Unaweep Canyon and Bangs Canyon. Moreover, the Access Fund owns property within the boundary of this planning effort; in 1991 we purchased property in Unaweep Canyon to ensure climbing access to cliffs on BLM land.

¹ <http://www.westernslopeclimbers.blogspot.com>

² Much climbing also exists in Colorado National Monument and Rabbit Valley south of I-70 near the Utah-Colorado border, but the notice of intent for this project specifically excluded land managed by other agencies (National park Service for CNM) and the lands within the McInnis NCA where Rabbit Valley lies. Also, much climbing occurs in Escalante Canyon which, to our estimation, lies just south of this RMP planning area (but potentially within the proposed Dominguez-Escalante National Conservation Area).



Given the significance of the climbing within the GJFO's planning area to the climbing community, the Access Fund supports reasonable and effective climbing management policies for this planning initiative that benefit climbing opportunities while providing the BLM with effective guidance to appropriately manage important resources and values. The Access Fund would like to offer assistance towards any future management planning initiatives by the BLM's Grand Junction Field Office that involve climbing.

The Access Fund regularly assists land management agencies on climbing management in the following ways:

- Work with local climbing organizations such as the Western Colorado Climbers Coalition (<http://www.westernslopeclimbers.blogspot.com>)
- 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 newsletter.
- 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 RMP may be appropriate for Access Fund grant support.

In addition, please see <http://accessfund.org/pdf/CM-web.pdf> for a copy of the Access Fund publication Climbing Management: A Guide to Climbing Issues and the Production of a Climbing Management RMP. This publication—recently updated—has proven helpful to dozens of land managers across the country who work on climbing related issues. Also reference <http://accessfund.org/resources/ncms.php> which is an online resource available to land managers and climbing activists that provides information on a variety of climbing management issues around the country involving federal, state, local, and private climbing properties.

The Access Fund recognizes that recreational access must be balanced with proper management, which may include restrictions to protect the natural, cultural, and social resource values and the integrity of the landscape. However, it is important to note that Grand Junction Field Office also contains some of the most unique, popular, and challenging technical climbing opportunities in the country. Grand Junction Field Office also hosts vast areas of unexplored rock faces that could provide unparalleled first-ascent potential for future climbers. Accordingly, the BLM should accommodate climbing opportunities in the Grand Junction Field Office management area as much as possible.

Because the Access Fund is concerned with the preservation of these climbing opportunities, we provide these comments to assess the probable effect of this proposed



management initiative, point out problematic use restrictions and management issues, offer planning suggestions, and comment on the appropriate scope of this RMP.

II. ACCESS FUND SCOPING COMMENTS

The Access Fund's primary concerns regarding the scope of RMP for the Grand Junction Field Office RMP are as follows

A. Recreation

There is a lot of recreation within this RMP management planning area, rock climbing in particular. In this RMP, the GJFO should provide for and protect the many recreational rock climbing and bouldering opportunities found at Rough Canyon, Bangs Canyon and bouldering along CO Highway 141 between Whitewater and Unaweep Canyon, Unaweep Canyon, The Palisade area north of Gateway, climbing locations along CO Highway 141 south of Gateway, climbing and bouldering on the southern slopes of Mount Garfield near the trailhead access from I-70, and DeBeque Canyon along I-70 and its side-canyons.

The GJFO should consider designating these outstanding climbing areas—especially Unaweep Canyon and the bouldering along CO Highway 141 between Whitewater and Unaweep Canyon—as Special Recreation Management Areas (SRMA) and work collaboratively with the local climbing community (especially the Western Colorado Climbers Coalition) to ensure the needs and preferences of this group are met as per the GJFO's recreation scoping documents ("structured recreation demand from identified markets"). In establishing SRMAs the BLM should increase staffing and funding to appropriately focus on adding value to the lives of local and visiting climbers who frequent the outstanding climbing found in the GJFO RMP planning area.

In addition, to ensure that these unique climbing opportunities are protected, the BLM should limit energy development in the area, develop a plan to make sure that motorized recreation does not conflict with or negatively impact low-impact recreation such as rock climbing, and inventory and plan for managing special status species and cultural resources so that any restrictions at these areas are reasonable and consistent with federal regulations and policies.

The BLM at Grand Junction Field Office should develop criteria that would guide and direct decisions on managing new climbing and bouldering routes. A first consideration for management action by the BLM should determine whether potential impacts to resources can be mitigated through climber education and outreach. The Access Fund believes the BLM should focus on responding with a reasonable lesser restrictive alternative to address resource impacts rather than area closures or regulatory restrictions



on use. The BLM should also consider effective means by which it can notify the climbing public of any interim or permanent closures such as signage or media outlets.

1. Education/Community Outreach

A climber outreach program is a critical component to any effective climbing management initiative. Nearly all climbers will choose to “do the right thing” if they know the appropriate behavior. For example, signage educating climbers regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund applauds the proactive management approach taken by the BLM in this regard, but for this RMP to be successful the BLM should work with the climbing community directly to foster understanding, appreciation, respect, and a sense of ownership for the resources within the GJFO planning area. In addition to promoting a Leave No Trace ethic, the BLM should continue to do all it can to incorporate the climbing community into any management initiatives—such as raptor closures—that may affect public use of the area. By soliciting input from the climbing community directly on any proposed management initiative, the BLM will secure a key partner that can provide insight into specific resource issues and conditions, labor for building trails or other infrastructure, support for regulation compliance, and a good relationship with one of its largest user groups.

Climbers have a long tradition of resource stewardship and support for natural and cultural resource protection. This tradition can be harnessed to support this BLM RMP, through consistent outreach, and an emphasis on education rather than law enforcement. We recommend that all issues pertaining to climbing at Grand Junction Field Office, including climbing use patterns, climber traditions and history, or information about technical climbing tools and ethics, be dealt with through a climbing advisory/working group. Such a group—such as the WCCC—will facilitate gathering, sharing, and processing of information on specific issues.

2. Human Waste

Human waste can be a significant issue at areas that are popular climbing locations. The GJFO RMP should consider signage educating climbers regarding Leave No Trace principles posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund has found that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and suggest alternative conduct that can ameliorate the problem. The BLM should document the extent of this impact prior to or during the implementation of the RMP so that any proposed management solutions will be based on objective information



B. Energy Development

The GJFO's scoping documentation related to oil and gas leasing in the RMP management area (Map 5.2 - Oil and Gas - Leases and Wells) identifies existing leases for oil and gas exploration and drilling. Three areas where leases are currently authorized (west of the Dolores River near The Palisade area [north and west of Gateway], the tower climbing and bouldering on the southern slopes of Mount Garfield near the trailhead access from I-70, and DeBeque Canyon along I-70 and its side-canyons) have the potential to impact the recreational experience of climbers and others visiting these areas. The GJFO should consider limiting any new oil and gas leases at these areas and make no changes that could authorize new leases at any of the other climbing areas identified in this scoping letter.

The GJFO should not make the same mistakes made in Utah by the Moab Field Office with regard to oil and gas leasing near high-value recreation areas, and be very clear about what areas could have new leases (within existing or future authorization areas), and the scope of impacts these leases could cause.

C. Special Designation Areas

The notice of intent and associated GJFO documents related to this RMP process note that the following special designations may be established: Areas of Critical Environmental Concern, Wilderness Study Areas, and Special Recreation Management Areas.³ The GJFO's scoping documentation related to Special Designations in the RMP management area (Map 7.2 - Special Designation Areas) identifies that climbing in the proposed wilderness areas could be restricted by this plan, especially with regard to wilderness.

1. Wilderness

The BLM's Interim Management Policies for the use of climbing fixed anchors⁴ in a WSA is more restrictive than once these WSAs become designated wilderness. The BLM's IMPs related to fixed anchors in WSAs ban the placement of new fixed anchors during this interim period. Once WSAs become designated wilderness, BLM Instruction

³ On the day that these comments were filed, US Senators Udall and Salazar introduced legislation that would establish the Dominguez-Escalante National Conservation Area. It is unclear how this designation—which is not incorporated into the "Special Designations" scoping map provided by the GJFO—might affect recreational access in the Dominguez-Escalante area. The BLM, as it moves towards the next step of this planning process, inform the public of the implications, if any, of the NCA for the GJFO RMP planning area.

⁴ For more background on the use and necessity of fixed anchor for wilderness climbing, see <http://www.accessfund.org/pdf/CM-web.pdf> pages 27 and 46.



Memo 2007-084⁵ provides for a process to authorize new fixed anchor placements. Several concerns relate to these new restrictions and the Access Fund has long worked cooperatively through our bureau-wide MOU⁶ with the BLM to craft reasonable policies related to climbing fixed anchors and BLM wilderness management. For more background on this longstanding issue, see <http://www.accessfund.org/pdf/JointBLMfixed.pdf>

The GJFO should ensure that the unique climbing afforded at places like The Palisade area north of Gateway and Sewemup Mesa (referenced above as the scattered climbing locations along the Dolores River and CO Highway 141 south of Gateway) are not unnecessarily restricted by WSA designation and that an effective and reasonable authorization process be established quickly for the placement of new fixed anchors.

2. Critical Resource

The Palisade area north of Gateway is proposed as two different Critical Resource designations: Scenic Values and Sensitive Butterflies. Beyond labels on maps, the GJFO scoping documents provide no information regarding if and whether and how the BLM might manage to protect these resources.

D. Travel Management

The GJFO will develop RMP alternatives for natural, biological, cultural resources, resource uses and special designations. After these resources issues have been addressed, travel management alternatives (including appropriate travel route systems and designations for motorized, mechanized and non-mechanized uses) will be identified to meet the goals and objectives of the RMP alternatives.

The Access Fund supports the restrictions proposed in the GJFO's scoping documentation related to travel management in the RMP management area (Map 7.3 - Travel Management, Handout 7.3 - Travel Management). However, the area just south of Unaweep Canyon (along the Divide Road and its various side roads) is currently open to off-road travel. Climbers regularly camp in this area and have in the past been disturbed by unmanaged off-road vehicles. Accordingly, the GJFO should limit this area to limited to designated routes.

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http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2007/im_2007-084.html

⁶ <http://www.accessfund.org/pdf/AF-BLM-MOUfinal.pdf>



1. Trails

At present there exists a network of user-built trails established by the climbing community to access the various climbing cliffs within Grand Junction Field Office planning area. The BLM should consider whether to formally acknowledge and incorporate these trails into the RMP. If trails are incorporated, the BLM should determine what level of trail development and maintenance is appropriate or required, what materials should be used, and what level of maintenance will be regularly needed, if any.

In maintaining these trails, the BLM should consider working with the local climbing community and Access Fund to help build effective trails using volunteers for high use climbing and bouldering areas. Climber assistance for constructing access trails may be available to the GJFO where volunteers can work with agency officials to build trails, address erosion concerns, and better serve the needs of the agency and user community.

E. Cultural and Natural Resources

The GJFO's scoping documentation related to natural and cultural resource management in the RMP management area (Map 6.4 - Rare and Threatened Plants, Map 1.1 - Cultural Resources, Handout 1.1 - Heritage Resources) identifies no conflicts between climbing and cultural resource management; however, there are few potential areas where climbing and natural resource management strategies should be considered (see below).

The Access Fund supports natural and cultural resource management decisions based on thorough information about the condition of field resources and visitor use. The use of baseline data is critical to making informed decisions when imposing management prescriptions to protect these resources. This RMP should clarify how such information will be gathered and a timeline developed for an inventory of natural and cultural resources and associated recreation impacts or potential impacts. Any analysis of the effects of recreational use on natural and cultural resource values begins by looking at patterns and levels of use, as well as the location and sensitivity of these resource values. Once this information has been obtained a determination may be made as to whether any management intervention is necessary for protection of that resource value.

As with the issues related to protecting flora and fauna, there exist laws and regulations that protect recognized historical and cultural resources. This management authority already provides the BLM with the legal means to implement protective measures that may affect recreational use patterns at Grand Junction Field Office. As such, it may be unnecessary to specifically address such issues in the Grand Junction Field Office RMP other than to implement some pro-active mitigation measures to, for example, preserve rock art adjacent to popular climbing routes or bouldering areas. However, unless there are specific resource conflicts with recreation that are currently identifiable, the Access



Fund suggests that the BLM use existing federal and state laws—instead of this RMP—to manage for the protection of natural and cultural resources.

1. Special Status Species Management

a. Flora

The GJFO's scoping documentation related to special status species management in the RMP management area (Map 6.4 - Rare and Threatened Plants) identifies some overlap between climbing and rare plant regions. However, GJFO scoping documents reveal no overlap between climbing and 1987 RMP's inventory of Threatened and Endangered Species.

When planning for the management of climbing and special status species the GJFO should consider that instead of any potential access restrictions into areas with rare plants, alternate climber trail routing and the strategic use of fixed anchors have proven to be effective resource protection tools that do not require unnecessary access restrictions. If many climbers use an area, some degree of formalization and stabilization of climber trails will eventually become desirable. Some climber trails may be redundant or adversely affect resource or aesthetic values. Such trails can be minimized or in some cases eliminated. Local climbing representatives can provide input on the minimum trail requirements to access climbing locations. Management response may initially include conducting a climber trail inventory. Local climbing guidebooks will often describe climber access routes, descent routes, and locations of other climbing-related trails. Consultation with a local climbing representative or arranging a joint site visit may also help with climber-trail inventory.

Once trails are documented, a map is created. If necessary, a trails plan can be developed to eliminate redundant or unnecessary trails. Some trails may be targeted for stabilization or upgrading to withstand heavier traffic, while others may be closed to protect sensitive resources, and replaced with new, re-routed trails. Local climbing representatives may prove helpful in dispersing information concerning desired changes in climber-trail use. Other management options include signing of management-preferred trails, and brochure, kiosk, and poster information concerning site advisories or area closures. There have been many examples of successful climber trail management.

At Idaho's City of Rocks National Reserve, for example, climbers and hikers originally used (and then expanded) livestock trails through sagebrush vegetation. A park-wide trails plan was developed to identify a rational trails network and mitigate impacts. At California's Joshua Tree National Park, climber-trail networks have been formalized using a special climber-specific symbol. This is produced in the form of a weather resistant sticker that can be applied to standard trail marking carsonite posts. The symbol



(an image of a carabiner—a piece of climbing equipment) is recognizable to climbers, but not the general public.

Fixed anchors can also serve as a resource protection tool. Their strategic placement lets climbers descend to the ground without needing to exit over the cliff edge, allowing cliff-top vegetation to remain undisturbed. Rappel anchors are available in earth-tone colors for low visual impact. This practice is widespread on dozens of federally-managed public lands across the country.⁷

b. Fauna

The GJFO's scoping documentation related to special status species management in the RMP management area (Map 8.1 - Avian Species of Concern) also identifies some overlap between climbing and protected avian species. Evidently there are Bald Eagles and Peregrine Falcons in Unaweep Canyon and The Palisade area. The GJFO's scoping documents do not state any proposed management actions for avian species habitat nor whether these areas are currently active nesting sites, and if the GJFO has consistent and current data on nesting and fledgling viability. The Draft RMP with alternatives should also provide specifics regarding current nesting sites.

The Access Fund has long been an active stakeholder in the various federal and state policy development related to climbing and cliff-nesting raptors. For example, see our publication *Raptors and Climbers: Guidance for Managing Technical Climbing to Protect Raptor Nest Sites*.⁸ Climbing activity can affect wildlife in ways including attraction, habituation, and avoidance. Human presence can affect the reproductive success of wildlife by causing disturbance during breeding, feeding, or resting, or by disruption of habitat. Local climbing representatives can provide information on climbing activity and use patterns to assist resource specialists in understanding where and how climbing may affect wildlife values. Evaluation of climbing effects on wildlife should also consider effects by non-climbing visitors. Education strategies may focus on promoting awareness and recognition of sensitive species, utilization of wildlife-proof food-storage techniques, and general minimum-impact practices to protect habitat.

Management techniques may include diversion of approach or descent trails to minimize habitat fragmentation or wildlife disturbance, and use limits and seasonal restrictions for species with special-protection status. The majority of existing wildlife-related climbing restrictions have been implemented to protect cliff-nesting raptors. Seasonal climbing restrictions protect nest sites during the breeding season by partial or complete closure of cliffs where raptors nest. Restrictions usually extend from February through to mid-August, but vary with elevation and latitude.

⁷ See <http://www.accessfund.org/pdf/CM-web.pdf>, page 28.

⁸ <http://www.accessfund.org/pdf/raptor08.pdf>



Ideally, sites are regularly monitored and restrictions may be lifted or altered if birds fail to nest, change nest sites, or if birds fledge before the end of the restriction date. If seasonal restrictions are deemed necessary, their spatial extent will depend on many factors. Considerations will include the species-specific factors such as distribution, history of breeding success, ecological requirements, and how climbing or other recreation activities affect behavior or nesting requirements. Restriction boundaries typically take into account cliff features such as protruding buttresses that may serve as visual and sound barriers, vertical height of nests, pattern of climbing use such as proximity of established climbing routes, and tolerance of individual pairs of birds.

* * *

I hope the above information helps the BLM identify the appropriate scope for the Grand Junction Field Office's RMP and clarifies ways in which the Access Fund and local Grand Junction climbing community may be of assistance. Please do not hesitate to contact me if you require more information, or would like to discuss any of the points covered in this comment letter. The Access Fund looks forward to working with the BLM and any interested parties throughout the RMP process for the GJFO.

The climbing found within the Grand Junction Field Office is unique and important to the climbing community. We hope our comments will provide a meaningful contribution to both the substance and clarity of the RMP regarding planning goals, objectives, strategies, and the preservation of recreational opportunities.

Best Regards,

A handwritten signature in blue ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith
Policy Director
The Access Fund

Cc: Western Colorado Climbers Coalition
Brady Robinson, Access Fund Executive Director