



Protect America's Climbing

November 17, 2010

Mark Tanaka-Sanders
BLM Wilderness Planning
4701 North Torrey Pines Drive
Las Vegas Field Office
Las Vegas, Nevada 89130
Email: Mark_Tanaka-Sanders@blm.gov

Re: Access Fund Scoping Comments to Bureau of Land Management Proposed Arrow Canyon Wilderness Management Plan

BLM Planners:

The Access Fund welcomes this opportunity to provide scoping comments to the Arrow Canyon Wilderness Management Plan. We hope these comments assist with the BLM's goal of fulfilling the purposes of the Wilderness Act of 1964 and the Federal Land Policy and Management Act of 1976 and develop the appropriate scope for this plan. Of particular interest to our members are the goals in this plan that would designate trails to permit public access to popular features in the management area, and developing guidelines and policies for technical rock climbing including fixed hardware and maintenance.

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 10,000 members and affiliates. We advocate on behalf of approximately 2.3 million technical rock climbers and mountaineers nation-wide. 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. Many of our members live and climb in Nevada including Arrow Canyon.

Arrow Canyon Climbing

Arrow Canyon is an important resource for rock climbers who come here from Las Vegas, Salt Lake City and elsewhere. The climbing at Arrow Canyon varies from vertical climbing to overhanging cave climbing, and the routes range in difficulty from intermediate to expert with the majority of the routes in the 5.11 grades on the vertical walls and 5.12 in two caves. Climbers have long been considerate of significant resources issues at Arrow Canyon, including the religious significance that the Moapa Tribe hold for the canyon as well as the high concentration of Native American rock art, shelters and artifacts, and several historic period carvings into the limestone. Climbers also have respected local rules that prohibit climbing within 100 feet of any rock art and the restriction on the placement of new fixed anchors.

A significant number of our members climb regularly at Arrow Canyons. Given the significance of Arrow Canyon to the climbing community, the Access Fund supports reasonable and effective climbing management policies for this area that benefit climbing opportunities while providing the BLM with effective guidance that protects other important resources and values. The Access Fund would like to offer assistance towards any future management planning initiatives that involve climbing at Arrow Canyon.

Access Fund Assistance and Expertise

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

- 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 newsletter.
- Meeting and other communications with our key stakeholders to develop compromise management solutions.
- 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. In addition, please see <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/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 Plan.” This publication, now in its second edition, has proven helpful to dozens of land managers across the country who work on climbing related issues. Also please reference www.climbingmanagement.org which is a new 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.

Relevant Law and Policy

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. The Clark County Conservation of Public Land and Natural Resources Act of 2002 protected 18 wilderness areas near Las Vegas as part of the National Wilderness Preservation System, and created Arrow Canyon Wilderness Area. In the Clark County Act, Congress declared that the Arrow Canyon area “contained unique and spectacular natural resources,” including “thousands of acres of pristine land that remain in a natural state.” Accordingly, the BLM should, as directed by Congress, continue to preserve the area to “benefit the public” by, in part, “conserving primitive recreational resources.” Rock climbing at Arrow Canyon constitutes a popular form of primitive recreational activity and the BLM should emphasize climbing opportunities accordingly.

On March 15, 2007 the BLM issued Instruction Memorandum No. 2007-0849 that “provides guidance on the use of permanent fixed anchors in BLM’s designated Wilderness Areas.” That memo “recognizes that

climbing is a legitimate and appropriate use of BLM Wilderness Areas. Climbing, including the use of fixed anchors, has a history that predates the Wilderness Act, and Wilderness Areas represent a unique resource.” The BLM also acknowledged that climbers may use hand-powered drills to place permanent fixed anchors so long as they do not cause unacceptable impacts on BLM wilderness. However, the BLM may require visitors to get a permit or other authorization to place (or replace or remove) a new fixed anchor. In so doing the BLM “may strive for low densities of climbing routes and may prepare management plans that include climbing management decisions, and guidance on the use of permanent fixed anchors.” Specifically, The BLM instruction Memo provided guidance regarding standards for decisions to approve or reject new fixed anchor applications. In sum, as with federal legislation, the BLM’s internal fixed anchor guidance memo also underscores an emphasis on providing recreational opportunities such as climbing experiences that require new fixed anchor placements in designated BLM wilderness.

While developing climbing management policies at Arrow Canyon that comply with the above-noted laws and policy guidance, the BLM also should acknowledge that the ability to explore the vertical wilderness at Arrow Canyon, and to climb new routes that require some basic level of fixed anchor use, most closely fits Wilderness Act goals of providing “outstanding opportunities for solitude” and “primitive and unconfined type[s] of recreation.” While the occasional use of fixed anchors is necessary for this type of climbing activity, the specific use and location of such new anchors is unpredictable and thus can be difficult to manage in advance.

According to Instruction Memorandum No. 2007-0849, local BLM managers may identify instances where the use of permanent fixed anchors is appropriate or inappropriate in Wilderness Areas. The following examples demonstrate cases where the use of permanent fixed anchors may be appropriate in Wilderness Areas:

- Using permanent fixed anchors to reduce impacts on vegetation or soils; or
- Placing a few permanent fixed anchors to improve climbers’ safety on sections of routes where the use of removable hardware is not feasible.

The following examples demonstrate cases where the use of permanent fixed anchors may be inappropriate:

- Establishing new routes that contribute to an unacceptable density of climbing activity;
- Placing permanent fixed anchors on an existing climb that did not previously have permanent fixed anchors; or
- Installing a permanent fixed anchor near sensitive archaeological resources or raptor nesting site.

BLM may use its authority under 43 CFR 6302.19 and 8364.1 to undertake closures or restrictions. These regulations require a written determination by the local manager that such measures are needed to protect persons, property, and public lands or resources. The following are examples of cases where the use of such authority may be appropriate:

- Protect public health and safety;
- Prevent unacceptable impacts in Wilderness Areas; or
- Minimize visitor use conflicts.

Minimizing visual impact should be considered when placing permanent fixed anchors. The BLM encourages the use of bolt hangers painted in colors similar to the surrounding rock. The BLM instructs

its managers to strongly encourage climbers to employ the principles of Leave No Trace to minimize the impact of climbing, including the removal of ropes and slings from permanent fixed anchors.

For Arrow Canyon the BLM should develop criteria that would guide and direct decisions on managing new climbing 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.

Fixed Anchors

The Access Fund has a long history of working on fixed anchor policies with land management agencies. We are currently working with the US Forest Service and National Park Service to develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas. Fixed anchors, especially bolts, are sometimes controversial. In our experience concerns about bolting are almost never related to the resource impacts that may be associated with the placement and use of these traditional climbing tools, but rather to philosophical convictions. The Access Fund maintains that any decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment.

Climbing anchors are necessary for climbers to experience the unique challenges found at Arrow Canyon, however it is the Access Fund's position that fixed anchors are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for fixed anchors to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. Furthermore, the specific character of much of the rock at the Arrow Canyon requires that some level of fixed anchor use be authorized if climbing is to take place. Many of the popular technical routes at Arrow Canyon have some fixed anchors, and many future classics will require the same. Accordingly, the Access Fund believes that some level of fixed anchor use must be allowed in Arrow Canyon wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations.

Trails

At present there exists a network of user-built trails established by the climbing community to access the various climbing cliffs within Arrow Canyon. The BLM should consider whether to formally acknowledge and incorporate these trails into the Las Vegas Field Office Resource Management Plan. 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 climbing. Climber assistance for constructing access trails has proven successful where volunteers have worked with agency officials to build trails, address erosion concerns, and better serve the needs of the user community.

Human Waste

Human waste can be a significant issue at areas that are popular climbing locations. The Arrow Canyon Wilderness Plan 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 Wilderness Plan so that any proposed management solutions will be based on objective information. The BLM should also consult the resources recently developed at the American Alpine Club's Exit Strategies conference—see <http://www.americanalpineclub.org/exitstrategies>.

Cultural Resource Protection

The Access Fund supports 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 Wilderness Plan should clarify how such information will be gathered and a timeline developed for an inventory of cultural resources and associated recreation impacts or potential impacts. Any analysis of the effects of recreational use on cultural resource values begins by looking at use levels and patterns, 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. There exist laws and regulations that protect recognized historical and cultural resources, and this management authority already provides the BLM with the legal means to implement protective measures that may affect recreational use patterns at Arrow Canyon. As such, it may be unnecessary to specifically address such issues in the Arrows Wilderness Plan other than to implement some pro-active mitigation measures to, for example, preserve rock art adjacent to popular climbing routes. However, unless there are specific resource conflicts with recreation that are currently identifiable, the Access Fund suggests that the BLM use existing federal law and policy instead of this Wilderness Plan to manage for the protection of cultural resources. Presumably, the BLM currently has data identifying the locations of sensitive resources at Arrow Canyon, and some of this information may be confidential. Nevertheless, the interface between the location of such special status resources and recreational activity should be appropriately analyzed in detail before any management prescriptions are identified and imposed under this Wilderness Plan.

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 understand the appropriate behavior and the justification for any restrictions. 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. For this Wilderness Plan to be successful the BLM should work with the climbing community directly to foster understanding, appreciation, respect, and a sense of ownership for the cultural resources of Arrow Canyon. 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 significant user groups. Climbers have a long tradition of resource stewardship and support for cultural resource protection. This tradition can be harnessed to support BLM planning, through consistent outreach, and an emphasis on education rather than law enforcement.

* * *

I hope the above information helps the BLM identify the appropriate scope for the Arrow Canyon Wilderness Plan and clarifies ways in which the Access Fund can 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 planning process for the Arrow Canyon Wilderness Plan.

I will contact your office in the next few weeks to explore whether there is a good time in early 2011 to do a site visit to Arrow Canyon to discuss resources management concerns with the BLM and any interested stakeholder, in particular the local Moapa Tribe.

Best Regards,

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

Jason Keith
Policy Director
The Access Fund

Cc: Las Vegas Climbers Liaison Council