

June 12, 2007

BLM Wilderness Planning
4701 North Torrey Pines Drive
Las Vegas Field Office
Las Vegas, Nevada 89130

Re: Access Fund Scoping Comments to the *Wilderness Management Plan Preliminary Proposed Action, La Madre Mountain and Rainbow Mountain Wilderness*

BLM Planners:

The Access Fund welcomes this opportunity to provide scoping comments to the *Wilderness Management Plan Preliminary Proposed Action, La Madre Mountain and Rainbow Mountain Wilderness*, and this effort to provide reasonable and effective management direction for federally-designated wilderness within the Red Rock Canyon National Conservation Area.

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.

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.

I. INTRODUCTION

Red Rock Canyon National Conservation Area ("Red Rocks" or "NCA") has long been one the most outstanding rock climbing areas in the United States. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, unique climbing challenges, and convenient access. In particular, Red Rocks is known to climbers as one the country's foremost multi-pitch sandstone free climbing areas, and climbers from around the nation and

internationally travel to the area for its unique desert climbing challenges. Red Rocks is also one of the country's few wintertime climbing areas.

The Access Fund has a proud record of conservation work and climber activism in at Red Rocks,¹ 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 climbing management policies for this area that benefit climbing opportunities while providing the BLM with effective guidance that protects NCA resources and values. The Access Fund would like to offer assistance towards any future management planning initiatives that involve climbing, including any future non-wilderness initiatives at Red Rocks.

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.
- 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://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 Plan*.² This publication has proven helpful to dozens of land managers across the country who works on climbing related issues. Also reference <http://accessfund.org/resources/ncms.php> 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.

¹ For example, the Access Fund worked with Las Vegas climbers and public activists to defeat a housing development that would have built hundreds of homes directly across from the NCA's famous canyons. This proposal would have forever changed the dramatic Red Rocks viewshed. See <http://www.camp4.com/news/index.php?newsid=542> and <http://accessfund.org/pdf/Red-Rocks-dev.pdf>.

² Check back later this year for a 2007 update to the Access Fund's CMP document.

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 Red Rocks also contains some of the most unique, popular, and challenging technical climbing opportunities in the country. Red Rocks 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 Red Rocks Wilderness Plan especially when considering that climbing was a significant use of the area—including the use of fixed anchors—prior to the NCA becoming designated wilderness in 2002. 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 wilderness plan.³

II. THE RED ROCKS WILDERNESS PLAN

The Access Fund applauds the goals and objectives, as indicated by the BLM, for the Red Rocks Wilderness Plan, especially the Wilderness Management Objectives section which states that the BLM intends to provide for new fixed climbing anchors in a way that creates routes “that are aesthetic and enjoyable to the climbing community as a whole.” Furthermore, we support the concept within the Permit 1-style fixed anchor application which recognizes that a *de minimus* amount of fixed anchor use at Red Rocks should not require lengthy application processes. See our past comments to the BLM on this issue at <http://www.accessfund.org/pdf/JointBLMfixed.pdf>.

The Clark County Conservation of Public Land and Natural Resources Act of 2002⁴ protected 18 wilderness areas near Las Vegas as part of the National Wilderness Preservation System, and created La Madre and Rainbow Mountain Wilderness Areas which comprise much of Red Rock Canyon. NCA. This law recognizes that:

³ These Access Fund scoping comments are purposefully more in-depth than may be typical for a NEPA scoping process. In our experience, some of the most important planning decisions are made following the scoping period when agency planners are formulating specific alternatives based on scoping feedback. Thus, my comments are more comprehensive than simply stating what I believe should be the scope of the Red Rocks Wilderness Plan. In addition, this “Preliminary Proposal” for public scoping is the most detailed I have ever seen for this phase of the planning process. This level of detail—complete with a \$40k fixed anchor survey—seems more consistent with a draft plan phase of a planning process, thus these more specific comments.

⁴ http://www.nv.blm.gov/snplma/legislation/pdf/PublicLaw107_282.pdf.

Red Rock Canyon is a natural resource of major significance to the people of Nevada and the United States. It must be protected in its natural state for the enjoyment of future generations of Nevadans and Americans, and enhanced wherever possible.⁵

In the Clark County Act, Congress declared that the Red Rock Canyon area⁶ “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.”⁷ Rock climbing at Red Rocks easily constitutes its most common form of primitive recreational activity and the BLM should emphasize climbing opportunities accordingly.

The Clark County bill was designed to further fulfill the purposes of the Southern Nevada Public Lands Management Act of 1998 and the Red Rock Canyon National Conservation Area Establishment Act of 1990,⁸ which created the NCA. That 1990 law seeks to “conserve, protect, and enhance for the benefit and enjoyment of present and future generations . . . Red Rock Canyon and the unique and nationally important . . . recreation resources of the public lands therein.” To do this, Congress established the Red Rock Canyon National Conservation Area. Both of these laws support an emphasis on recreational opportunities such as rock climbing and, by extension, that activity’s necessary tools and equipment.

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 Red Rocks NCA 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

⁵ Clark County Conservation of Public Land and Natural Resources Act of 2002. Public Law 107-282.

⁷ Id.

⁸ 16 U.S.C. 460ccc-1 (OSCN 2007), CHAPTER 1 - NATIONAL PARKS, MILITARY PARKS, MONUMENTS, AND SEASHORES; SUBCHAPTER CXIV - RED ROCK CANYON NATIONAL CONSERVATION AREA. See http://www.law.cornell.edu/uscode/16/usc_sup_01_16_10_1_20_CXIV.html.

⁹ <http://www.blm.gov/nhp/efoia/wo/fy07/im2007-084.htm>.

anchors.” Specifically, The BLM instruction Memo provided guidance regarding standards for decisions to approve or reject new fixed anchor applications.¹⁰ 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 Red Rocks that comply with the above-noted laws and policy guidance, the BLM also should acknowledge that the ability to explore the vertical wilderness at Red Rocks, 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 difficult to manage in advance. Although the BLM’s preliminary management proposal notes that the natural character of Rainbow Mountain and La Madre Wilderness areas “is generally free of human imprint except for former vehicle trails, two small dams, and to certain extant bolted climbing routes,” the BLM should also note the existence of the urban atmosphere (complete with city lights and helicopter over flights) and the associated lack of perception that the area is in fact a federally-designated wilderness area. Time and education can reshape perceptions, but restrictions on climbers who fail to see wilderness

¹⁰ 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.

characteristics at Red Rocks could inhibit their compliance and thus the success of the Red Rocks Wilderness Plan. Accordingly, the BLM should do more to educate the public generally that Red Rock NCA is, for the most part, designated wilderness, and that any new restrictions or policies affecting any user group need to make sense and be clearly stated (i.e., what seem to be artificial and arbitrary limits on new fixed anchors according to zone). Failure to articulate new rules and the reasons therefore will limit buy-in by affected user groups, especially longtime Red Rocks climbers and those accustomed to climbing at other popular wilderness areas across the country that are much less-restrictive than the proposed Red Rocks Wilderness Plan.

The BLM at Red Rock Canyon NCA 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.

If any restrictions are considered, the BLM should develop an analysis that asks: “are climbing activities likely to have an adverse impact on protected natural, cultural, or social resources present within the management area?” In developing this kind of analysis, the BLM should define precisely what “adverse impact” means within this context. Without such a clear definition, arbitrary determinations will necessarily guide management actions. The preliminary Red Rocks proposal, thus far, is unclear what constitutes an adverse impact (especially with regard to climbing and bolts) and thus the public is largely uncertain as to the purpose and need for the proposed management action. Only by clearly setting such impairment standards will the BLM be able to make rational and objective evaluations regarding how climbing impacts wilderness values, if at all.

III. ACCESS FUND SCOPING COMMENTS

The Access Fund may support an alternative modeled on the preliminary proposal if the key revisions are addressed. The Access Fund’s primary concerns regarding the scope of planning for the Red Rocks Plan are as follows

- Management Resources
 - Does the BLM have the resources—staff, time, and funding—to
 - Effectively process new fixed anchor applications
 - Monitor the backcountry to adequately assess the location and character of new routes and the level of existing fixed anchors

- Bolt Quotas
 - Will the bolt quotas serve the intended purpose of protecting the wilderness character at Red Rocks?
 - Will the bolt quotas cause an unmanageable mandate for the BLM with unintended consequences of installing arbitrary numerical bolt limits at every climbing wilderness area in the country?
 - Should a more gradual approach to managing bolts be considered—in lieu of numerical limits—that takes into account the wide range of wilderness indicators, rather than overemphasizing the number of current and future fixed anchors?

Specific Access Fund Comments regarding the scope of the Red Rocks Wilderness Plan:

A. Fixed Anchor Permit Applications

The Access Fund has a long history of working on fixed anchor policies with land management agencies. Indeed, we are currently assisting all the major federal land agencies 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 Red Rocks, 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 Red Rocks requires that some level of fixed anchor use be authorized if climbing is to take place. Nearly all of the popular technical routes at Red Rocks 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 Red Rocks 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. Some specific comments regarding the preliminary proposal with regard to fixed anchor permit applications:

- The Wilderness Management Objectives section indicates that the BLM seeks to provide for fixed anchors in a way that creates routes “that are aesthetic and enjoyable to the climbing community as a whole.” How will the BLM define the subjective “aesthetic and enjoyable” for the purposes of fixed anchor permitting processes?
- New fixed anchor permits: does the BLM have the capacity (in staff, time and money) to manage and effectively process a fixed anchor permit system. How will the BLM analyze new fixed anchor permits? Will field inspection be used? How will the public have access to review Permit 2-type permits? Will an online page be provided the public for analysis and comment? The BLM should list all permits applied for and their final disposition, approved or denied, and why.
- Permit 1: The three-bolt-per-pitch requirement could cause climbers to attempt unnecessary dangerous run-outs attempting to fit into Permit 1 application requirements. Furthermore, if a new 10-pitch route has one face pitch with six bolts and the rest of the climb has none at all, then the three-bolt limit should be compared to the overall length of the route, especially if there are no new bolts within the first 100.’ In addition a multi-pitch route that has two bolts with in the first 100 feet and no bolts for the next three pitches should also be considered for Permit 1 consideration.
- Also, with routes that go in ground-up (most of Red Rocks), there is no effective way to predict if 1) climbers need more than three bolts per a pitch, or 2) to identify to the BLM the exact locations for any new bolts as required under a Permit 1 application. Climbers can almost always tell when putting up a route ground-up if they will need any bolts in the first 50’ or so, but it can be hard to tell in the 50-100’ range. Perhaps the BLM should consider a policy whereby the first bolt should be over 100’ if the route is directly above or near a trail, but 50’ from cliff base if the route is not above a or near a trail.
- The intention of the various permit scenarios is evidently to allow a few bolts along otherwise natural terrain without long bolt ladders. However, including bolt quotas (overall or in a Permit 1) may result either dangerous or contrived routes. The BLM should consider counting a double-bolt belay or rappel station as one anchor.
- Permit 1: restricting bolts within 100 feet of the cliff base may not accomplish BLM goals for walls a long distance from trail heads with few human encounters.
- How will the BLM process Permit 1-type applications? How will BLM staff know that Permit 1 criteria have been complied with (i.e., 100’ and three-bolt restrictions)?
- Will the BLM process all Permit 1 applications each month (as opposed to only 5 Permit 2 applications each month)?
- Who at the BLM will evaluate both Permit 1 and Permit 2 applications? There are many subjective criteria for approval under Permit 2 that could cause public concern.
- Must those applicants that are not one of the five Permit 2 applications picked reapply each month?

- Will a 30-day comment period become too much of a disincentive for applicants? Will the permit system result in no fewer illegal bolt placements?
- Will the 30-day comment period produce effective consultation? How will permit processors weigh public input concerning each application?
- Permit 1: why the 100' limit? Why that *specific* distance before a first bolt may be placed? The BLM should clearly state this reasoning.
- How will the BLM enforce the various bolting regulations?
- Permit 1: this type of application recognizes that a *de minimus* amount of bolting is acceptable without a lengthy permit process. Is it possible that some climbers could create a dangerous condition if they try to create a Permit 1 route when it really needed Permit 2 bolt amounts? That is, should there be some mechanism for the BLM to allow climbers to come back after the fact and inform the BLM that they were reasonably forced to place more anchors than allowed under Permit 1 prescriptions.
- The BLM should consider eliminating the zero-bolt rule in the Pristine Zone. A reasonable compromise would be to limit the Pristine area to Permit 1 type applications, or even a Permit 2 if the route is exceptional.

B. Bolt Quotas

Specific bolt quotas as a management tool with the Red Rocks Wilderness Plan raise concerns because such numerical limits for bolts in wilderness climbing areas have never been implemented (other than to ban them altogether). The Access Fund understands that in designated wilderness there exists a threshold where it may inappropriate to allow additional fixed anchors. However, the BLM may want to consider whether such quotas are necessary and if the preservation of wilderness characteristics may be accomplished without such numerical limits that may prove difficult for the BLM to enforce and for the climbing community to understand and accept. Some other points to consider include:

- How and why did the BLM come up with specific numeric caps for each wilderness area and each canyon? This should be clearly stated in the draft Plan.
- Bolt inventory: will the current bolt inventory totals be counted against the quota if the inventory was found to be incorrect (i.e., new anchors are found)
- Bolt Quota: The numbers of bolts per canyon ignores the quality and attractiveness of the climbing. If climbers added 400 plus bolts to First Creek, it would totally change the nature of the area, while 200 bolts in Black Velvet would probably not change things as much.
- Are the bolt quotas a reasonable or necessary restriction? What will happen if the numbers are exhausted before the ten-year term of the plan?

- Will rappel anchor totals be counted against the bolt quota where rappel anchors could be used proactively as a resource-protection tool? That is, should the BLM not include anchor bolts in the quota so that there's no disincentive for climbers to avoid placing bolts rappel anchors as a resource protection tool.
- If a bolt quota is put into place then the BLM should consider reevaluating the potential number of bolts per canyon/area periodically to assess whether reasonable management adjustments are appropriate (see LAC and VERP discussion below).
- Focusing on a bolt quota ignores the many other indicators of wilderness character (such as soil condition, social encounters, sensitive plants/animals, etc.), all of which could cumulatively better inform a management assessment matrix. For example, the BLM might look at a management alternative that proposes on-going assessments of each major canyon (1 per year?) instead lieu of canyon-by-canyon bolt quotas. To accomplish these assessments that BLM could form teams that include the Las Vegas Climbers Liaison Council (as formal liaison to the Red Rocks NCA) and other interested climbers to work with BLM staff and others to report on the environmental status of each canyon. These assessments could look at several wilderness indicators to measure the effect of the management plan (including, presumably, some version of the Permit 1 and Permit 2 concept). The plan could then be adaptive and either harden specific quota numbers or continue using the bolt "targets" or "benchmarks" as a guide for acceptable levels of change. Obviously, this idea would require an agency commitment of resources (time, money, staff) and participation by the climbing community for much-needed public buy-in to set the plan up for success.
- Perhaps a better formula for accomplishing the goals of the plan is to analyze more aspects of the Red Rocks environment that, together, reveal changing conditions under various use scenarios. As you know, agencies within both USDA and DOI use management planning methodologies (like LAC and VERP) that identify a broad spectrum and relevant indicators to analyze as a means for better understanding acceptable change limits with regard to specific management obligations and goals.¹¹

C. Hardware Specifics

The BLM proposal addresses hardware specifics by stating: "So to minimize impact to the rock, all fixed anchors must be stainless steel, minimum 3/8" diameter and minimum 3 1/2" deep to assure the longest durability possible and the least frequent replacement." Especially considering all new holes will be hand-drilled, the BLM should consider hole-depth of 2 1/2" because the gain

¹¹ See, for example, the following agency links describing the Limits of Acceptable Change (LAC - http://www.nm.blm.gov/aufo/el_malpais_stand_alone/ApdxD.final.mb.wpd.pdf) process and the Visitor Experience, Resource Protection (VERP - <http://planning.nps.gov/document/verphandbook.pdf>) planning method. Both of these management planning methods use flexible and adaptive management prescriptions to better accomplish the intended purpose and goals of planning processes.

in sheer strength with the extra inch is very small and when drilling by hand holes of 2 ½ inches are less like to “cone” and cause less secure “spinner” bolts. Many climbers that hand drill use 2 ½ length bolts while 3 ½ inch depth for bolt holes are more common for climbers using battery-operated power drills which are less likely to cause “coning.” Additional considerations include:

- How will fixed hardware specifications be enforced?
- Is a 2 ½” bolt-length acceptable as per ASCA (<http://www.safeclimbing.org/>) recommendations?
- All bolts and chains should be camouflaged and all chains should be fitted with larger diameter links (1600# min.).
- The BLM may also want to consider whether requiring (rather than suggesting or encouraging) specific bolt hardware requirements may expose the agency to liability if such regulatory requirements were ever causally connected to a climbing injury at Red Rocks.

D. Management Zones

The BLM has identified three specific management zones with distinct standards and potential rules: Pristine, Primitive and Semi-Primitive. The BLM should clearly specify why each area was so designated and why the boundaries were demarcated as they were. Additionally:

- Under what criteria does the BLM distinguish the pristine, semi-primitive and primitive zones? These zones should be clearly identified on maps in the draft plan. How will these boundaries be marked in the backcountry, if at all?
- Why will fixed anchors be prohibited under any circumstance in the Pristine zone?
- How will the BLM enforce the encounter limits in the Pristine, Primitive, and Semi-Primitive areas?
- The BLM scoping plan limits “group” encounters. How/why are encounters defined as between groups? How is “group” defined?

E. Trails

At present there exists a network of user-built trails established by the climbing community to access the various climbing cliffs within Red Rock Canyon NCA. The BLM should consider whether to formally acknowledge and incorporate these trails into the NCA’s General 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 high use climbing and bouldering areas. Climber assistance for constructing access trails has proven successful in Red Rocks where volunteers have worked with agency officials to build trails, address erosion concerns, and better serve the needs of the user community.

F. Human Waste

Human waste can be a significant issue at areas that are popular climbing locations. The Red Rocks 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.

G. Natural and Cultural Resources

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 Wilderness Plan 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.

Just 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 Red Rocks. As such, it may be unnecessary to specifically address such issues in the Red Rocks Wilderness Plan 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

Wilderness Plan—to manage for the protection of natural and cultural resources. Presumably, the BLM currently has data identifying the locations of sensitive resources throughout Red Rocks NCA, 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.

H. 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 at the Red Rocks, but 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 natural and cultural resources of Red Rocks. In addition to promoting a Leave No Trace ethic at Red Rocks, 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 BLM planning, through consistent outreach, and an emphasis on education rather than law enforcement.

We recommend that all issues pertaining to climbing at Red Rocks, 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 will facilitate gathering, sharing, and processing of information on specific issues. The Las Vegas Climbers Liaison Council is formally acknowledged in the Red Rocks General Management Plan as the formal contact between the climbing community and the BLM. The Access Fund supports consistent communication with this local climbing organization (<http://www.lvclc.org/>).

IV. SUMMARY

The Access Fund's feels that this preliminary proposal holds some potential for a management framework that could lift the longstanding fixed anchor ban at Red Rocks. With some significant revisions, this proposal could fulfill the BLM's wilderness management obligations, gain crucial support from the climbing community, and preserve important wilderness climbing opportunities found only at Red Rocks. If the preliminary proposal were to go forward close to its current draft, many small questions would have to be addressed regarding purpose and need to directly manage bolts rather than ensure the conservation of wilderness character at Red Rocks. Fundamentally, the BLM must address why and how it has/will identify permissible bolting levels.

Secondly, if the BLM can justify its numerical limits and proceeds to a two-tiered permit system, then many details regarding the processing of these permits must be addressed, especially: does the BLM have the internal management resources to process a constant and complicated permit system that is at least time-consuming?

Third, is a bolt quota necessary? The Access Fund agrees that there should be reasonable limits on new fixed anchor placements in Red Rocks wilderness, but the BLM should consider whether it might further its wilderness mandate more by adopting a more flexible plan that views the numerical limits more as "targets" or "benchmarks" that would then require additional assessment (involving the climbing community). Birding groups often conduct bird surveys for public land agencies, why not have climbers assess and inventory climbs for the BLM at Red Rocks? Critical to this new wilderness plan is balancing effective wilderness management with a reasonable bolting policy that climbers will buy into. If this plan proves too restrictive, cumbersome, or seemingly unjustified, then noncompliance will result in enforcement difficulties for the BLM and climbing restrictions for climbers.

* * *

I hope the above information helps the BLM identify the appropriate scope for the Red Rocks 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 Red Rock Wilderness Plan. Red

Rock Canyon National Conservation Area is truly an international treasure, both as a climbing resource and as unique wilderness. We hope our comments will provide a meaningful contribution to both the substance and clarity of the Wilderness Plan regarding planning goals, objectives, strategies, and the preservation of recreational opportunities.

Best Regards,

Jason Keith
Policy Director
The Access Fund

Cc: Las Vegas Climbers Liaison Council
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