



August 3, 2010

National Park Service
Attention: Planning and Compliance
Arches National Park - Climbing and Canyoneering Management Plan
2282 S. West Resource Blvd.
Moab, UT 84532

Re: Access Fund Scoping Comments for Arches National Park Climbing and Canyoneering Management Plan

Arches planners:

The Access Fund welcomes the opportunity to provide scoping comments to the Arches National Park Climbing and Canyoneering Management Plan (CCMP). Please also reference the Access Fund's scoping comments submitted in 2007¹ when this management process was originally initiated. The Access Fund supports the primary objective for this plan to "provide opportunities for forms of visitor enjoyment that are uniquely suited and appropriate to the natural and cultural resources found in the park." A significant number of the Access Fund's members climb in Arches, and we hope these scoping comments help identify reasonable and effective climbing management alternatives for the park.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 15,000 members and affiliates. Utah is one of our largest member states.

The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers, and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. Our publication "Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan"² addresses both fundamental aspects and narrowly-focused issues pertaining to climbing management.

The Access Fund has a proud record of conservation and climbing activism regarding the many public land climbing areas found in the greater Moab area. This work includes advocacy on BLM resource management plans and SITLA land sales affecting climbing

in the Fisher Towers, acquisition and stewardship projects in Castle Valley, and helping to create the Friends of Indian Creek.³ To support our commitment to Arches National Park we have worked in partnership with the local Moab climbers who have made up an “Arches Task Force” and volunteered dozens of hours to replacing old climbing anchors throughout the park and “cleaning up” tattered slings used on rappel stations that may be noticeable to the casual Arches visitor.⁴ We also recently opposed proposed oil and gas projects that could have a negative impact on the viewshed at Arches National Park (ANP).⁵ The Access Fund also worked with the NPS following the May 2006 Delicate Arch controversy after which significant restrictions were imposed on the climbing community.⁶ At that time we reached out to our members and partners to help foster an understanding of NPS management obligations, including those specific to Arches. We met with the NPS locally in Moab, but also with NPS officials in Washington, DC to work toward a more collaborative partnership. For more information about the Access Fund, visit www.accessfund.org.

I. INTRODUCTION

Climbing in Arches National Park

Arches National Park is renown as one the most unique and historic desert climbing venues in America. Climbers go to Arches for it’s unique combination of scenic beauty, remarkable landscape, historic climbs, diversity and concentration of climbing routes, and unique Entrada Sandstone. More than anything, climbers are drawn to the distinctive multi-pitch desert towers scattered throughout the park that provide exhilarating summit experiences.

Climbers have been visiting Arches since the 1960s, before it was a national park, when the impressive summit of Argon Tower was first scaled. After more than 40 years since those first ascents in Arches, climbers continue to seek out the adventurous routes found throughout the park especially in the Courthouse Towers area where no less than six major desert towers are located. To a significant number of desert climbing enthusiasts, these Arches towers are on the short list of must-do climbs on the Colorado Plateau.

Specific attributes of Arches National Park, such as the world-class arches and sensitive wildlife, underlie the various climbing regulations found in the park’s compendium, such as the climbing prohibition on any named arch or natural bridge and the seasonal closure of specific climbs (Bubo, Devil Dog Spire) to protect cliff-nesting birds. However, the May 2006 restriction on “permanent climbing hardware” was a reaction to the climb of Delicate Arch and not a planning process that demonstrated a need to limit these necessary climbing tools. Many climbers will agree that new fixed anchors should be monitored—as done at Zion National Park—to allow justifiable management responses that limit resource impacts. To allow for the many unique unclimbed backcountry climbing opportunities still found in Arches, the park should consider a policy for lifting the blanket ban on fixed anchors and allow some level of new anchors placements that enable the descents off the summit of a tower (rappel anchor), or to ascend a climb by placing a new anchor that connects otherwise naturally-protected terrain.

America’s Great Outdoors Initiative

It is important to acknowledge the White House Initiative on America's Great Outdoors (AGO) when considering appropriate management options for this Arches CCMP. As you know, the AGO Initiative is designed to “reconnect” Americans to the outdoors—including “great parks” such as Arches—by “promoting community-based recreation and conservation.”⁷ AGO seeks to encourage partnerships between private entities and non-profits to assist with many of AGO’s programmatic goals, but there should also be an institutional commitment from the land management agencies to help reconnect Americans to their public lands through activities like low-impact climbing. As part of our MOU with the National Park Service,⁸ the Access Fund and our Outdoor Alliance partners have been working with the Obama Administration to turn out leaders from the active outdoor recreation community to the public AGO “listening sessions,” and we have been encouraged by Department of Interior officials to produce our own listening sessions across the country where we’ll collect public feedback to submit along with the formal Interior report due this November.

It is in the spirit of this larger collaboration with federal land management officials on AGO, our MOU with the NPS, and the context of this plan’s ability to significantly impact climbing opportunities at Arches National Park that the Access Fund provides these scoping comments.

GENERAL COMMENTS

Many of the goals and objectives outlined by ANP in its scoping brochure for this plan are appropriate. The Access Fund agrees that this CCMP should consider the development of approach trails and new routes, the use of fixed hardware, and the effects climbing and canyoneering may have on the safety and experiences of park visitors. However, Arches National Park planners should indicate the specific need for this CCMP, publish baseline and trend data reflecting park uses and conditions, and clarify how climbing and canyoneering might be managed similarly or differently (since they are lumped together in this plan). Park statements indicate a need for this plan because “increased climbing and canyoneering use” is “straining the park’s ability to effectively manage those activities in Arches.”⁹ Have both these activities increased in the park? If so, how does commercial guiding activity contribute to this increase (in terms of overall number and impact) if at all. Arches National Park planners should include in its draft CCMP the use statistics and baseline impact studies associated with both climbing and canyoneering to demonstrate possible concerns related to resource impacts, as well as to demonstrate the “strain” on the park’s ability to manage these activities.

II. PLANNING ISSUES IDENTIFIED BY ARCHES NATIONAL PARK

The Access Fund supports the stated goals for this CCMP:

- Protect and conserve the park’s natural and cultural resources and values, and the integrity of wilderness character for present and future generations.
- Ensure that recreational uses and activities in the park are consistent with its authorizing legislation or proclamation and do not cause unacceptable impacts on park resources and values.

The Access Fund agrees that the NPS should protect and conserve park resources we believe that low-impact recreation like climbing and canyoneering is consistent with the authorizing legislation for Arches National Park.

The Arches National Park Enabling Law

The presidential proclamation and act of Congress creating and designating Arches National Monument and Arches National Park govern what constitute appropriate uses and activities for the park. Arches National Monument was established by Proclamation No. 1875 “to protect extraordinary examples of wind erosion in the form of gigantic arches, natural bridges, ‘windows,’ spires, balanced rocks and other unique wind-worn sandstone formations, the preservation of which is desirable because of their education and scenic value.” Appropriate recreational activities in Arches, such as low-impact climbing, do nothing to impede this important conservation purpose, and actually create unique opportunities for experiencing these unique geologic landforms. After several boundary enlargements, Congress redesignated the area as Arches National Park in 1971. That law,¹⁰ which abolished Arches National Monument yet provided no specific additional mandate or guidance for the management of Arches as a national park, directed the Secretary of the Interior to “administer, protect and develop the park in accordance with the provisions of the law generally applicable to units of the National Park System.” (16 U.S.C. § 1 Chapter 1).

In 16 U.S.C. § 1, Congress declared that the National Park System should be preserved and managed for the benefit and inspiration of all the people of the United States.¹¹ Section 1C requires that each area within the national park system “be administered in accordance with the provisions of any statute made specifically applicable to that area ... and the various authorities relating to the administration and protection of areas under the administration of the Secretary of the Interior through the National Park Service.”¹² In other words, the administration of Arches National Park, including recreation management, is to be consistent with how all parks are administrated elsewhere in the National Park System. Accordingly, for this CCMP, Arches planners should look—in addition to the NPS Organic Act and its own Management Policies—to other parks with similar conditions, resources, and climbing/canyoneering opportunities when designing its specific policies for managing climbing for Arches National Park.

Unacceptable Impacts

A primary goal of this CCMP is to “ensure that recreational uses and activities in the park are consistent with its authorizing legislation or proclamation and do not cause unacceptable impacts on park resources and values.” The Access Fund generally supports this statement, but the management policies that emerge from this plan will result from how ANP planners define what constitutes an “unacceptable impact.” This standard should be clearly outlined in the draft CCMP (preferable with similar references in other NPS plans). The term “unacceptable impact” as a standard for land management raises many questions. For example:

- Could an “appropriate use” also sometimes cause “unacceptable impacts”?
- Does ANF have specific examples of an “unacceptable impact”?
- What is the difference between a use or activity that causes "unacceptable impacts" and a use or activity that causes "impairment"?
- How significant are “unacceptable impacts” when compared to “impairment”?
- Can a significant impact be acceptable? Can an “unacceptable impact” not be significant?

Arches planners should clarify how “unacceptable impacts” will be defined for the purposes of the CCMP and how the standard might trigger various management responses.

Climbing and Canyoneering Management

The recreational climbing resource at Arches National Park is world-class, historic, and greatly valued by many climbers that have frequented the park for years. The Access Fund supports efforts to mitigate impacts caused by climbing, but there should also be a strong recognition in the draft CCMP that the special climbing opportunities found here represent an important park value that should be acknowledged and as a longstanding legitimate recreational activity in Arches National Park.

This plan should also recognize the differences between climbing and canyoneering when analyzing impacts to specific zones of Arches National Park. While the ANP’s scoping letter states that since 2007 canyoneering has “grown in the park to such a degree that the National Park Service (NPS) must now consider whether additional management of canyoneering is needed to protect park resources and values,”¹³ it is unclear whether the same is true of climbing in Arches. Climbers and canyoneers share many of the same resource management implications and challenges, and the Access Fund has in the past worked with canyoneering groups elsewhere on assistance with public land access and conservation initiatives. Indeed, many Access Fund members are canyoneering enthusiasts and even use some of the routes at issue with this CCMP. However, it is important to note that there are significant differences in the use patterns of climbing and canyoneering.

For example, most of the climbing in Arches is in the front-country and located near roads and existing trails. A smaller number of backcountry climbing routes are accessed via low-impact approaches along dry washes. Unexplored climbing opportunities in the park may require cross-country hiking without a trail but this traffic will likely be very low with most climbing activity occurring in a few specific park locations: The Penguins, Park Avenue, Courthouse Towers, Owl Rock, and Devil’s Garden. Most climbs in Arches (some historic and first climbed nearly 50 years ago) are either a stones-throw from an existing highway or very close to a park trail and thus climbing has very different management and resource implications when compared to backcountry canyoneering.¹⁴

Most climbers do not travel in the areas that canyoneers frequent and park planners should not necessarily combine management policies for the two activities without analyzing whether there are significant differences between the two user groups in terms of numbers, unique impacts, and use patterns (when, for example, looking at carry capacity or “encounter” events associated with wilderness management). In the draft CCMP Arches NP planners should provide data indicating both the patterns and scales of use between climbing and canyoneering, examine how much use in each activity is from commercial sources, and consider management policies specific to each activity and management issue as appropriate. For those climbing opportunities in the park that do require a more lengthy approach across the desert, the Access Fund agrees that specific cross-country routes within the park should be managed (identified and perhaps even marked) so that both climbers and canyoneers can leave the least impact. Park planners should also provide specific definitions for what constitutes “climbing” and “canyoneering.”

Delicate Arch Rulemaking

The Arches National Park scoping newsletter notes that “unusual climbing activities raised public interest and concern about issues associated with technical rock climbing” and these events led the park “to take a new look at [its] climbing policies.” It is the “unusual activities” of May 2006—and not the conduct of the climbing community or condition of the climbing resource—that led directly to new comprehensive climbing restrictions related to the use of fixed anchors in Arches National Park. As stated in previous letters to ANP,¹⁵ the Access Fund views the compendium amendments that imposed these new regulations to be an inappropriate management response to the actions of one individual (which were very unlikely to be repeated) yet affecting everyone.

Two primary concerns emerged from the May 9, 2006 climbing restrictions at Arches and these points are relevant to the current scoping process. First, climbers need the occasional use of removable hammered pitons on “aid climbing” routes where removable anchors won’t work. Such “piton” use (sometimes lumped in with local fixed anchor management policies) is necessary to ascend many of the unique towers in ANP that require “direct aid,”¹⁶ and a complete restriction on piton use will make these historic climbing routes forever off-limits. With the sudden May 2006 compendium change many decades-old climbing routes in the park were closed without a justifiable need and in the

process significantly eliminated longstanding unique climbing opportunities in the park. Secondly, climbers require permanent fixed anchors (typically expansion bolts) to descend from summits (both on existing and new routes). The compendium change made current climbs potentially less safe and significantly restricted low-impact wilderness climbing opportunities in the Arches NP backcountry, many of which may only require a single anchor to rappel off a remote summit. With the new fixed anchor ban, many ANP climbing areas are now effectively closed unnecessarily.

Climbers rely on at least a minimal use of fixed anchors to safely experience the unique climbing opportunities found only at Arches. The CCMP should consider allowing climbing on existing direct aid climbing routes that require a basic use of removable hammered pitons. Zion National Park may most closely parallel the climbing resource found at ANP (like Arches, Zion features a significant front-country desert/wilderness climbing) and has standards for managing wilderness climbing including the use of fixed anchors and removable pitons for direct aid climbing.

Zion National Park Climbing Management

Zion's recent 2007 Backcountry Management Plan provides

direction for management of natural and cultural resources within the context of wilderness and backcountry management policies, with primary focus on visitor use and impacts to wilderness values and resources and administrative actions to mitigate associated impacts. This plan treats any proposed or recommended wilderness the same as officially designated wilderness, based on NPS *Management Policies 2006* (6.3.1).¹⁷

Zion's BMP (90% of which was recommended wilderness at the time of the plan and became designated wilderness in 2009) authorizes limited climbing closures ("kept to the minimum area and duration necessary") to address resource concerns, and allows fixed anchors so long as they don't detract from the general visitor's experience:

Specific climbing routes will be closed (seasonal or permanent) to address a specific resource concern. Examples include nesting species, hanging gardens, or archeological sites. Closures will be kept to the minimum area and duration necessary to protect the affected resource.

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Climbers will be encouraged to use rock climbing protection, slings, and other equipment that blend with the natural surroundings. If anchors detract from the aesthetics of the cliff faces of ZION and thus general visitor's experience, additional management actions will be taken. The use of chalk is allowed, however climbers will be encouraged to be sensitive to this issue. It is also the responsibility of climbers to ensure that their ropes are not left on walls for long periods of time. If problems persist, management actions could include requiring the use of natural colored anchor material, closing area, and/or the creation of a climbing management plan.

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Bolts should be considered the tool of last resort by visitors who are creating anchors. As mentioned above climbers, canyoneers, and others creating anchors will be encouraged to use natural colored anchor material (slings and hangers). The park will continue to monitor bolting in the backcountry.¹⁸

By adopting a policy for climbing and fixed anchors similar to Zion's BMP, the Arches CCMP can conserve important park resources while also identifying management scenarios that limit over-broad climbing restrictions, and thus restore many of the unparalleled experiences enjoyed by Arches climbers up to May 2006 .

III. SPECIFIC SCOPING COMMENTS¹⁹

The following Access Fund comments address issues already identified by the NPS and public stakeholders through internal and preliminary project scoping:

Wilderness Climbing

Since much of Arches National Park is managed as wilderness,²⁰ park planners should consider how special wilderness regulations could affect climbing in the park. The Access Fund has been working since 1989 with all of the federal wilderness management agencies to resolve the issue of how climbing and fixed anchors should be managed in wilderness. We also have negotiated directly with the environmental community to achieve broad support for a national policy which allows, but limits, the use of new fixed anchors in wilderness. With regard to fixed climbing anchors in designated wilderness, we believe:

1. Some level of fixed anchor use must be allowed wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis. Surveys of the climbing community show that the vast majority of climbers support this position.
2. Climbers, not the government, should bear the responsibility for determining when to place safety anchors and how to use these tools. The Arches Task Force (see below) has already proven climbers capable and effective in the self-management of fixed anchors.
3. The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. The continued use of fixed anchors, if properly managed, will not degrade wilderness resources and values.
4. Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife. This function is sacrificed if any use of fixed anchors is prohibited. For

example, some of the rappel anchors in ANP could be relocated to reduce visual and physical impacts.

5. The Access Fund supports the ban on power drills in wilderness, and actively promotes the concept that bolts are a “tool of last resort.”

Resource concerns that some wilderness land managers relate to fixed anchors can easily be dealt with through the enforcement of power drill restrictions in wilderness-managed zones. Most climbers have never—and will never—place a fixed anchor. Nonetheless ANP planners should allow for some basic level of new fixed anchor placements if it is to restore the historic wilderness climbing opportunities found in the park.

Establishment of New Routes through a Permit System

Issues related to the “designation” of new climbing routes by permit are perhaps the most important part of this CCMP because the way the NPS manages such authorizations will affect many of the other issues in the plan. It is important that the NPS institute a presumption that new climbing routes be authorized within Arches everywhere there is no resource conflict or “unacceptable impact.” Unless there is a clear, imminent need to prohibit new routes based on objective environmental or social data, the presumption should remain that new climbing routes are permitted. If ANP decides to authorize new climbing routes by permit, planners should review climbing policies and permit practices established by other NPS units with similar management challenges. For example:

- Zion National Park Backcountry Management Plan²¹
- Rocky Mountain National Park Wilderness/Backcountry Management Plan²²
- New River Gorge National River Climbing Management Plan²³
- Obed Wild and Scenic River Climbing Management Plan²⁴
- Acadia National Park Climbing Management Plan²⁵
- City of Rocks National Reserve Climbing Management Plan²⁶

As in the above noted NPS climbing plans, Arches NP should develop criteria to guide and direct decisions on managing new climbing routes. The Access Fund believes the NPS should focus on responding with reasonable lesser restrictive alternatives to address resource concerns rather than implementing overbroad closures. The NPS should also consider effective means by which it can notify the climbing public of any interim or permanent climbing policies using the local climbing community, signage or other information at the visitor center, and various online resources and media outlets.

Installation/Replacement of Bolts, Anchors, and Software

The Access Fund has a long history of working on fixed hardware²⁷ policies with land management agencies. 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. We maintain 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.

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 the rock at Arches requires that some level of fixed anchor use be authorized if climbing is to take place there at all. Accordingly, the Access Fund believes that some level of fixed anchor use must be allowed in ANP wherever climbing is allowed, but the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations. Education and outreach to the climbing community will likely mitigate impact concerns the NPS may have regarding fixed anchors. Indeed, much of the visual concern related to fixed anchors has already been addressed by the efforts of the Moab-based Arches Task Force noted herein.

Bans on new fixed anchors in national parks are by far the exception rather than the rule. While some parks allow new fixed anchor placements with a special use permit, typically prior authorization to place a bolt or other fixed anchor is not required in most national parks, even in designated wilderness areas. In fact, the wilderness-managed national parks that see the most climbing traffic and fixed anchor activity require no permit at all for the placement of fixed hardware. Many of these parks have no formal climbing management plans and simply require that climbers abide by other controlling legislation or local rules. For example, in Yosemite National Park most of the climbing is found in designated wilderness but climbers are prohibited only from using power drills when placing new bolts (bolt-intensive climbs discouraged even using a hand drill), however no permit is necessary. Zion National Park—perhaps the closest national park parallel to Arches—presently has no restriction on new fixed anchors other than a power drill ban. As with Arches, both Yosemite and Zion host world-class “aid climbing” routes that require the placement and removal of hammered piton placements for direct aid.

Other wilderness national parks also have climbing management policies that explicitly allow new bolts but do not require permits. The Black Canyon of the Gunnison National Park in Colorado has an “interim climbing management plan”²⁸ that prohibits the use of power drills but bolts may be placed—without prior authorization—in “sections of the route that have no rock features adequate for the placement of removable anchors.” At Rocky Mountain National Park (RMNP), climbing provisions in a backcountry management plan allow new bolts but, as with the Black Canyon, urge discretion when placing permanent fixed anchors. RMNP's policies have proven so effective that other parks (Denali) have used them as a model. RMNP does not require permits for placing new fixed anchors, but bans the use of power drills and encourages climbers to use bolts as a “tool of last resort” and only place them to “connect otherwise naturally-protected terrain.” RMNP's particular management policies²⁹ are both fair to climbers and effective in protecting the unique park resources despite a high number of climbers visiting each year.³⁰

Some national parks require that climbers obtain a permit prior to placing any new fixed anchors.³¹ At Acadia National Park in Maine, for example, the NPS requires climbers hoping to place new anchors to present a permit application to a climbing advisory group who then issues a recommendation to the park whether to grant the bolting request.³² Some parks, such as the City of Rocks National Reserve in Idaho, have streamlined application processes that are reviewed in-house by a climbing ranger.³³ A climbing plan at the New River Gorge National River in West Virginia uses fixed anchors as a resource protection tool,³⁴ and even in areas with legal requirements for the highest land conservation standards, such as the Obed Wild and Scenic River, land managers allow new fixed anchors through advisory committees and permit processes.³⁵

Define Arches National Park Climbing “Ethics”

The Arches scoping brochure for this CCMP indicates the intent to consider “climbing ethics” (presumably, this also includes “canyoneering ethics” as well?). Park planners should focus more on specific management policies that will protect and enhance park values rather than seek to define subjective ethical perspectives that distinguish between good and bad, right and wrong. Climbers often disagree with the “ethics” of route development and other specific aspects of climbing as an activity. If the park were to develop management plans for other activities (hiking, camping, biking, etc.) planners would identify the values and needs of those specific activities and apply them as appropriate into park planning. The same is true of climbing and canyoneers.

The Access Fund agrees that this CCMP should adopt the following existing climbing regulations found in the park compendium as a baseline for appropriate management standards:³⁶

- If an existing software item (sling, runner, etc.) is unsafe, it may be replaced.
- Software (webbing, accessory cords, etc.) that is left in place shall match the rock surface in color.
- The intentional removal of lichen or plants from rock is prohibited.
- The physical altering of rock faces such as chiseling, glue reinforcement of existing holds, and gluing of new holds is prohibited.
- The use of motorized power drills is prohibited.
- Fixed ropes may not be left in place for more than 24 hours. Fixed ropes left in place longer than 24 hours shall be considered "abandoned property" and removed.
- The use of chalk for climbing must be of a color that blends with the native rock.

Establish Trail Systems

Off-trail hiking to access climbing routes is not prohibited in Arches National Park,³⁷ however, the park compendium states that “leaving a trail or walkway to shortcut between portions of the same trail or walkway or to shortcut to an adjacent trail or walkway is prohibited.”³⁸ Clearly, Arches climbers at some point must leave formal trails or parking areas to reach their chosen climbs, and this CCMP should outline scenarios where this limited off-trail access is appropriate. The Arches CCMP should consider to

what extent it will formally incorporate into the park trail system any existing climbing approach trails located throughout the park. Of primary concern to the NPS should be the development of approach trails to a few of the more popular climbing locations throughout the park such as the Courthouse Towers and Park Avenue areas. While not every climbing route needs a developed access trail, Arches planners should consider how to effectively limit impacts from foot traffic by climbers by formalizing a few key climbing access trails.

Many national parks have incorporated climber trails into their formal trail networks, but limit the size and scope of such trails to be more appropriate to the limited amount of traffic these trails will receive. Some parks, such as Joshua Tree and Pinnacles National Monument, post small signs or posts at the beginning of climber trails which have small climbing symbols on them such as carabiners or a climbing figures. These symbols key climbers into the location of approach trails but limit unnecessary use by the general park visitor. This plan should also consider alternate parking locations to serve climbers and canyoneers and which may also lessen congestion in established parking lots.

Sport Climbing and Bouldering

Given the particularly soft nature of the rock found in Arches, and the fact that the park is managed as wilderness, the development of sport climbs or other bolt-intensive climbs is not an activity that is consistent with the park's purpose and its mandate to manage much of Arches as designated wilderness. Also, resource conditions (rock type) in the park are ill-suited for sport climbing, and few climbers expect such an experience in Arches. There may be appropriate bouldering locations in ANP and the draft CCMP should identify such locations in the park and any baseline data to demonstrate or use patterns and impacts, if any.

Geology, Soils, and Vegetation

The Access Fund supports natural 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 policies to protect natural resources. The Arches CCMP should clarify how such information will be gathered and a timeline identified for an inventory of natural resources and associated climbing impacts or potential impacts.

For every permissible activity on NPS land there is an implied commitment of resources necessary to provide for that activity. Hikers need trails built which alter the landscape; horseback riders need hitching racks; tour groups need large parking lots paved; and the general public now expects extensive visitor centers and interpretive exhibits such as the one built at Arches. This minimal commitment of resources must be also allowed for rock climbing to continue as a legitimate use of Arches National Park.

While the occasional accidental dislodging of rocks must be expected in an activity like rock climbing, intentional "trundling" of rocks should be discouraged. The NPS can

address this issue by educating the climbing public as to safety and ecological concerns through on-site signage and community outreach. Further, the wholesale removal of organic material from cracks or the rock face should likewise be discouraged.

There are federal and state laws and regulations that currently protect sensitive natural resources. This management authority already provides the NPS with the legal means to implement protective measures that may affect climbing use patterns at Arches National Park. Unless there are specific natural resource-recreation conflicts that are currently identifiable, the Access Fund suggests that the NPS use the park's compendium instead of this CCMP to manage for the protection of special status flora and other natural resources.

Cultural Resources

The Access Fund supports the continued inventory and evaluation of cultural resources at Arches, the establishment of educational materials informing visitors to the park of the presence of cultural resources, and the development of cultural resource stewardship strategies and implementation of mitigation plans for known threats to cultural resources. The Access Fund has a long record of supporting resource-based closures such as those protecting cultural sites. In our experience, impacts from climbing on cultural resources can be mitigated through a number of means short of outright permanent closures. We encourage Arches National Park to consult with the Access Fund or local climbers if such conflicts arise so that we may effectively help to minimize both the recreational impacts of climbing on cultural resources, and assist in defining the appropriate the scope of any closure.

Just as with the issues related to protecting special status species noted above, there exist federal laws and regulations that protect recognized historical and cultural resources. This management authority already provides the NPS with the means to implement protective measures governing recreational use patterns at Arches National Park which may adversely impact such historical and/or cultural resources. As such, it may be unnecessary to specifically address issues in the Arches CCMP. This is especially true given that there appears to be no climbing conflicts at all between climbing and cultural/historical resources within Arches NP. Indeed, the Arches website reveals very little information on rock art or other cultural resources within park, much less any documented conflicts with recreation.³⁹ Unless there are specific documented cultural resource conflicts with climbing that are currently identifiable, the Access Fund suggests that the NPS use existing federal and state laws—instead of this CCMP—to manage for the protection of historic and cultural resources.

Wildlife and Species of Special Concern

The Arches CCMP should consider the extent that climbing activity may be restricted due to the presence of special status species such as peregrine falcons. The Arches NP compendium already prohibits climbing activity on Bubo, Industrial Disease on the Devil Dog Spire, and climbs along the River Road from January 1st to June 30th. Presumably these closures are to protect cliff-nesting raptors, but that purpose is not specified nor is

there much information published about special status wildlife in Arches National Park other than some generalized language about peregrine falcons. The Arches website notes that peregrines are “found in Arches, typically nesting in shallow caves high on cliff walls along the Colorado River.” Both Bubo and Devil Dog Spire are more than four miles from the Colorado River, so it is uncertain whether peregrine falcons are the purpose for these climbing closures. However, the Park website does state that “Arches continues to monitor peregrines today, and one pair is known to nest in the park.”⁴⁰ Arches planners should clarify the reasons for such closures and provide more educational information that justifies the necessity of the closures. Many parks have flexible closure periods depending on the presence and success of nesting bird populations, and Arches NP should consider whether its current closure periods are justified given the practices of dozens of public land units elsewhere that have lesser restrictive policies.

Social Impacts: Visual and Audio

While the Arches CCMP process should consider how climbing impacts the visual resource and visitor safety, there appear to be relatively few such conflicts in Arches National Park. The Access Fund supports management provisions that protect and enhance the world-class scenery at Arches, including the effects of climbing and climbing anchors. This is why we helped to spearhead the Arches Task Force program with ANP in 2007 to clean up old or unused anchors throughout the park and replace them with camouflaged anchors.⁴¹

Any visual and audio impacts caused by climbers should be considered in context with other visual and audio impacts from other sources, so that the most significant audio-visual impacts can be mitigated first. For example, the parking lots at Arches typically contain loud RVs and crowds of noisy tour groups. Are the audio-visuals impacts associated with these phenomena more, less, or equally significant than those caused by climbers? Before the visual and audio impacts of climbers are considered problems by the NPS, Arches should do a comprehensive analysis of both visual and audio impacts at Arches considering all sources and determine what noises are most problematic, what user groups or natural resources are most impacted, and identify the appropriate solutions to each discrete problem.

Commercial Guiding for Rock Climbing and Canyoneering

The Access Fund’s mission pertains specifically to non-commercial climbing activity, but park planners should also make sure to contact local Moab climbing and canyoneering outfitters, as well as the American Mountain Guides Association, for their input on commercial guiding in the park.

American Mountain Guides Association

<http://amga.com/>

<http://www.facebook.com/group.php?gid=13762479338&ref=ts>

Park planners should also contact canyoneering advocates to discuss commercial aspects of that activity in the park.

Zion Canyoneering Coalition
<http://www.canyoneeringusa.com/zcc/>

American Canyoneering Association
<http://www.canyoneering.net/content/>

Group Size Limits

Climbing is not typically a group activity and it's uncommon to see climbers in a group of more than four people (parties of two are the most common). Conversely, canyoneering and hiking in larger groups has proven to be a group activity that Arches and other parks have felt the need to manage. Given the sensitive soils and rock type found in Arches, park planners should consider whether this plan should set reasonable standards for group sizes. Currently the ANP compendium limits backcountry hikers to groups of 10⁴² and a maximum group size of 25 people for the Fiery Furnace specifically.⁴³ The park should consider whether this number is adequate and if planners should establish limits for other areas of the park, and if so what the standards for different locations should be. Zion National Park's Backcountry Management Plan established specific limits on group sizes;⁴⁴ Arches planners should consult with Zion to better understand the process they used for managing group sizes and whether those protocols have been effective.

Education

A first consideration for management action by the NPS should determine whether potential impacts to park resources from climbing and/or canyoneering can be mitigated through education and outreach.⁴⁵ Education and community outreach should be the centerpiece of any land management plan that may, in some form, affect the activities of an established user group. The Arches CCMP Plan should consider the role that education and public outreach will play in managing climbing and promoting climber stewardship and minimum impact practices.

* * *

The Access Fund supports the current climbing restrictions on any named arch or natural bridge, and the seasonal closure of specific climbs to protect cliff-nesting birds. However, Arches National Park has not demonstrated a need to completely ban “permanent climbing hardware” and this planning process should outline appropriate management alternatives to restore the use of these tools necessary for a safe climbing experience. Many climbers will agree that new fixed anchors should be monitored—as done elsewhere—and allow management actions that protect park resources.

I hope the above information helps Arches National Park identify the appropriate scope for the Arches National Park CCMP and clarifies ways in which the Access Fund can be of assistance. Once Arches planners have had a chance to analyze information from this scoping phase of the CCMP, the park should plan for an open house timed during the climbing season to ensure more input on the draft phase of the plan. The park is much more likely to gain the insight of the public's perspective if it held an open house or public meeting in the spring or fall seasons when there is a much higher chance of climbers to be in the Moab area.

The Access Fund looks forward to working with the NPS and any interested parties throughout the planning process for Arches National Park. The world-class character and long climbing history of this important area underscores the need for appropriate climbing management policies at Arches. 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.

Sincerely,



Jason Keith
Access Fund Policy Director

Cc: Friends of Indian Creek
Moab Area Climbers
Arches Task Force

¹ http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/UT_Arches%20scoping_18_5.1.2007.pdf

² <http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/CM-web.pdf>

³ <http://www.friendsofindiancreek.org/>

⁴ For more information on this volunteer stewardship effort, see http://mountainproject.com/v/utah/moab_area/arches/105913581

⁵ See <http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5001177&ct=6794293>

⁶ http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/UT_Arches%20Rule_21_10.19.2006.pdf

⁷ <http://www.doi.gov/americasgreatoutdoors/upload/2010outdoors-mem-rel-2.pdf>

⁸ <http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5071835&ct=7146889>

⁹ http://www.moabtimes.com/view/full_story/8929031/article-Arches-N-P--developing-new-climbing--canyoneering-management-plan?instance=secondary_five_leftcolumn

¹⁰ Arches National Park Act, Pub. L. 92-155, Nov. 12, 1971, 85 Stat. 422 (16 U.S.C. 272 et seq.).

¹¹ 16 U.S.C. § 1a-1.

¹² See Id.

¹³ <http://parkplanning.nps.gov/documentsList.cfm?parkId=25&projectId=31985>

¹⁴ http://www.mountainproject.com/v/utah/moab_area/arches/105716757

¹⁵ See http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/UT_Arches%20Rule_21_10.19.2006.pdf

¹⁶ For climbing term definitions, see the glossary at page 64 in “Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan” (<http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/CM-web.pdf>).

¹⁷ <http://www.nps.gov/zion/parkmgmt/upload/ZION%20BC%20Plan.doc>

¹⁸ See <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm> at 36 and 37. For more information, contact Ray O’Neil, Plateau District Ranger, Zion National Park: 435-772-7823

¹⁹ See also Access Fund’s comment regarding these topics from our 2007 scoping letter: http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/UT_Arches%20scoping_18_5.1.2007.pdf

²⁰ Because the President has recommended to Congress that most of Arches National Park become designated wilderness, National Park Service policy dictates that Arches National Park manage the recommended wilderness as though it were already designated wilderness.

²¹ <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm>

²² http://www.nps.gov/romo/parkmgmt/wilderness_backcountry_plan.htm

²³ http://www.nps.gov/neri/upload/neri_finalcmp.pdf

²⁴ <http://www.nps.gov/obed/final-CMP.pdf>

²⁵ <http://www.nps.gov/acad/planyourvisit/climbmgtpplan.htm>

²⁶ <http://www.nps.gov/ciro/parkmgmt/upload/Climbing.pdf>

²⁷ For this plan Arches planners should define “fixed hardware.” The conventional definition of fixed hardware or “fixed anchor” includes expansion bolts and pitons. The park should consider how other types of fixed gear, such as slings and stoppers, should be managed by this plan.

²⁸ http://www.nps.gov/blca/planyourvisit/upload/BLCA_climbing_plan-2.pdf

²⁹ <http://www.nps.gov/romo/planyourvisit/climbing.htm>

³⁰ The pertinent climbing provisions in RMNP’s Backcountry Management Plan are as follows:

2.1.4.6 Climbing Management

Hardware/Equipment.

A wide range of equipment and hardware has been developed over time to be used as protection for the climber. Hammer driven pitons which widened and scarred cracks have been generally replaced by removable devices, assisting in “clean climbing” practices. However, the exploration of steeper, more difficult face climbing has led to an increase in the placement of fixed, artificial protection (e.g., bolts) by some climbers.

Backcountry/Wilderness Management Plan and Environmental Assessment Plan Alternatives Rocky Mountain National Park 2-40 The use of removable and fixed anchors, as well as other climbing equipment, is appropriate in wilderness. However, fixed anchors must be placed judiciously and closely managed in order to prevent the degradation of wilderness resources and character. Where anchor points are necessary for climber safety, the use of removable equipment is desired and highly recommended. Fixed anchors should not be placed merely for convenience or to make an otherwise “unclimbable” route climbable.

Fixed anchors (e.g., webbing, bolts, pitons, chains) currently in place may remain. They may be replaced, or removed, by individual climbers, during a climb, or the NPS, during park operations. Safety remains a responsibility of the climber. The NPS will not, as policy or practice, monitor fixed anchors to evaluate their condition or accept any responsibility for fixed anchors.

The placement of new fixed anchors may be allowed when necessary to enable a safe rappel when no other means of descent is possible, to enable emergency retreat, during self rescue situations. The infrequent placement of new fixed anchors is allowed when ascending a route to connect terrain that is otherwise protected by removable anchors (e.g., one crack system or other natural feature to another) or when there are no features which will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during the ascent (e.g., traditional face climbing). New, bolt intensive climbing routes (e.g., sport climbs, bolt ladders) are not appropriate in wilderness and should not be created.

The Park may place and maintain fixed anchors for administrative and emergency purposes. When a climber determines the need for anchor placement or replacement, this must be accomplished in compliance with regulated and permitted standards (e.g., power drills prohibited). At this time there is no permit or approval system in place, or proposed, with regard to the placement of fixed anchors; however, one may be developed and implemented if the Park determines it is necessary, through research and monitoring, to protect natural and cultural resources.

³¹ At Acadia National Park in Maine, for example, the NPS requires climbers hoping to place new anchors to present a permit application to a climbing advisory group who then issues a recommendation to the park whether to grant the bolting request. See www.nps.gov/acad/planyourvisit/climbmgtpplan.htm. Some parks, such as the City of Rocks National Reserve in Idaho, have streamlined application processes that are reviewed by a climbing ranger. See www.nps.gov/ciro/parkmgmt/upload/Climbing.pdf. A climbing plan at the New River Gorge National River in West Virginia (www.nps.gov/neri/upload/neri_finalcmp.pdf) uses fixed anchors as a resource protection tool. Even in areas with legal requirements for high land

conservation standards, such as the Obed Wild and Scenic River, land managers allow new fixed anchors through advisory committees and permit processes. See www.nps.gov/archive/obed/final-CMP.pdf.

³² See www.nps.gov/acad/planyourvisit/climbmgtpplan.htm

³³ See www.nps.gov/ciro/parkmgmt/upload/Climbing.pdf

³⁴ See www.nps.gov/neri/upload/neri_finalcmp.pdf

³⁵ See www.nps.gov/archive/obed/final-CMP.pdf

³⁶ <http://www.nps.gov/arch/planyourvisit/climbing.htm>

³⁷ The Arches website simply encourages climbers “to access climbing routes via established trails, slickrock or sandy washes.” See <http://www.nps.gov/arch/planyourvisit/climbing.htm>

³⁸ See <http://www.nps.gov/arch/parkmgmt/upload/2009Compendium.pdf>

³⁹ Although there are at least eight monitored cultural sites in ANP, it is unclear where they are located. See <http://home.nps.gov/applications/parks/arch/ppdocuments/ACF1A2.pdf>. Ten sites were monitored during FY04. See www.nps.gov/arch/parkmgmt/upload/2004AnnualReport.pdf.

⁴⁰ <http://www.nps.gov/arch/naturescience/peregrine.htm>.

⁴¹ The Arches Task Force has already addressed this issue throughout the park, especially in the Courthouse Towers area. See http://mountainproject.com/v/utah/moab_area/arches/105913581

⁴² Groups camping in the park's backcountry are limited to a maximum of ten (10) persons per group and ten (10) head of riding and pack animals per group. Groups must locate camps at least one (1) mile apart.” See <http://www.nps.gov/arch/parkmgmt/upload/2009Compendium.pdf>

⁴³ The maximum daily limit in the Fiery Furnace is 75 people. See <http://www.nps.gov/arch/parkmgmt/upload/2009Compendium.pdf>

⁴⁴ See <http://www.nps.gov/zion/parkmgmt/upload/BC%20Plan%20Poster5%2024x36%20.pdf>

⁴⁵ Even after the Delicate Arch controversy there is very little educational material about climbing in the Arches National Park visitor center. Information about climbing could prove valuable to both climbers and the general public who may view climbers along the main park road.