



March 11, 2011

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 Comments for Arches National Park Preliminary Alternatives for Climbing and Canyoneering Management Plan

Arches National Park Planners:

The Access Fund welcomes the opportunity to provide comments to Arches National Park Preliminary Alternatives for Climbing and Canyoneering Management Plan (CCMP). Please also reference the Access Fund's various comments submitted in 2007 and 2010¹ during various stages of this planning initiative. The Access Fund supports aspects of Alternatives B and D outlined in the Preliminary Alternatives Newsletter published in February 2011. We also provide comments and suggestions to Actions Common to Alternatives B, C, and D.

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 2.3 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 11,000 members and affiliates. Utah is one of our largest member states and many of our members travel to climb at Arches National Park. For more information about the Access Fund, visit www.accessfund.org.

SPECIFIC COMMENTS

These comments are limited to climbing issues in Arches National Park (ANP or “the Park”) and do not address concerns related to canyoneering. Although the two activities may share a few issues—such as access trails—the two recreational uses occur in different locations and thus do not always share the same management concerns or solutions.

This plan would benefit from some basic zoning (or management classes), such as a “developed zone,” “backcountry transition subzone,” and “backcountry/wilderness zone.” The visitor center and campground could qualify as developed; the popular trails, roads, and recreation areas could be backcountry transition subzones; and everything else could qualify as backcountry. Such zoning will help planners consider reasonable and appropriate resource uses to protect a range desired conditions.

While the Access Fund supports Alternative D as the best choice for ANP climbing management, these comments highlights proposed aspects from each alternative that we support and note some proposals that we think unnecessary or problematic.

Alternative A – No Action (Current Management)

The Access Fund opposes Alternative A as many of the current management policies in ANP need revision and thus “No Action” is not an appropriate vision for the future climbing and canyoneering management in the Park. The Preliminary Alternatives Newsletter notes that “climbing is likely to increase over time.” Many parks in the West are seeing less or flat climbing visitation, and the draft plan should provide data that supports this statement especially if it is used to justify access restrictions.

Alternative B – Active Management

Alternative B proposes a variety of “active management” actions that the Park thinks will provide a balance between recreational use and resource protection. We support the approach to rehabilitate, monitor, and maintain access trails. Also, the free self-registration (voluntary?) may provide valuable data to the Park regarding climbing and canyoneering use characteristics, levels and trends. However, the proposal to require permits for all new climbing routes (even if not placing new fixed hardware?) lacks a clearly stated need and will impose a significant administrative burden on both the Park and climbers. Is there reason to believe that climbing new routes without placing new anchors causes unacceptable impacts? Does ANP have the resources to effectively administer such a permit program? Do resource conditions and current use/trends indicate that it is necessary to require a permit to place a fixed anchor in all cases? If so the draft plan should clarify the underlying basis for this need.

Limiting group sizes to 10 per group sounds reasonable; climbers rarely climb with more than three per party. Does the Park have a specific reason why it chose 10 as the group size limit? This CCMP should distinguish between different types of fixed anchors (e.g., bolts or pitons) and different needs (e.g., belays, rappels, or anchors for ascent). Park planners should consult with local climbing communities on these specifics, in particular on boundary determinations for programmatic fixed anchor authorizations and case-by-case fixed anchor permits for sensitive areas (see below).

Wilderness and Director’s Order #41

Since much of Arches National Park is managed as wilderness, park planners should consider how the current national NPS policy initiative related to wilderness climbing might affect this CCMP. We are hopeful that the forthcoming national direction in Director’s Order #41 will prove helpful to local parks while also avoiding unnecessary administrative burden on Parks and climbers. We believe that resource concerns that some wilderness land managers attribute to fixed anchors can easily be dealt with through the enforcement of power drill restrictions in wilderness-managed zones. Also, the most recent academic scholarship on this topic shows that the number of fixed anchors does not necessarily correlate with recreational use and associated

impacts, but rather proximity to the road and “star-rating” in a guidebook are the most relevant metrics when predicting the volume of climbing use at specific locations.² Furthermore, most climbers will never place a fixed anchor, and thus the focused concern on fixed anchors in this CCMP may be misplaced if the goal is balancing resource protection with appropriate recreation access. Park planners should allow for some basic level of new fixed anchor placements if it is to restore the historic wilderness climbing opportunities found at Arches.

If the Park does decide on requiring permits for hardware replacement and route establishment, there is a need to focus on rappel anchor locations to maximize resource protections. The strategic placement of descent anchors will avoid potential climbing impacts such as grooves caused by ropes that are pulled after a rappel. Also, the Park may want to consider the use of a local climber advisory committee as a filter for new route/anchor applications. The ANP should clarify specifically how it would use a minimum requirements analysis to guide the standards for new route applications because most of the public is unaware how this process works and its implications for new route applications.

Programmatic Fixed Anchor Authorizations

If fixed anchor authorizations are to be required in this CCMP, permission should be granted programmatically for specific park zones and through case-by-case permits for sensitive areas. After a more comprehensive survey of climbing activity, fixed anchors, and sensitive resources zones could be cleared and declared open for the *de minimus* use of new fixed anchors to descend a route or ascend a short section of a route to connect otherwise naturally-protected terrain.³ In Arches we believe the NPS will agree that it is unnecessary and burdensome to require authorizations for individual routes in every case. Park planners should consider whether the placement of fixed anchors in a developed zone and backcountry transition subzone necessitates a permit. Likewise, the replacement of existing fixed anchors (which can be accomplished with minimal resource impact) should also be exempt from required permits in all zones. Power drills—which create a superior and longer-lasting hole for fixed anchors than a hand drill—should be allowed in the developed zone and the backcountry transition subzone with a permit. The placement of any new fixed anchors in the most sensitive (or as-yet un-surveyed areas) could require prior approval in the form of an individual permit.

Rather than require permits for all new fixed anchors, a better option (already adopted by Zion, the most similar wilderness climbing park to ANP) is to first assess impacts and trends at the various climbing areas throughout the Park, and monitor conditions to evaluate whether permits are needed at all and if so at what locations. A park-wide survey of existing routes with fixed anchors could assess impacts to resources and visitor experiences, and a monitoring program (developed with the assistance from local climbers) could provide informed guidance and management oversight. To protect Park resources, specific management options could include provisions similar to those adopted by Joshua Tree, the one of the most popular wilderness climbing parks in the national park system:

- A cap on the total number of new climbing routes using fixed anchors (based on some objective need).
- The relocation of specific fixed anchors, creating consistent approach and descent routes, and permanent or temporary closures for sensitive or protected resources.

- All fixed anchors should be camouflaged or removed if deemed redundant or otherwise unnecessary.

Monitoring

Alternative B proposes a long-term monitoring plan to understand how climbing impacts Park resources. We support this approach as critical to any effective management plan. The Park may consider using its proposed self-registration program (if implemented) as a key source of data collection to inform its decisions related to trails and climbing. With respect to raptor nests, we support appropriate closure areas to protect these sensitive locations. The CCMP should provide a well-established definition for what constitutes a “historic” nesting site. The Park should also outline plans for the scope of these closures and provide climbers with regular updates. Many Parks trigger the end of seasonal closures with specific events tied to successful nesting.

Visual Impacts

With respect to visual impacts, we support policies that encourage anchors to match the color of the rock. Management policies that encourage camouflaged anchor materials, and the strategic placement of these anchors, will address most visual concerns related to climbing in Arches. Much of this camouflage and cleanup work was already accomplished by the informal Arches Task Force (now part of the local Friends of Indian Creek) in 2007 who removed old slings and replaced them with camouflaged chains. We agree that Entrada Sandstone lends itself to not requiring chalk, and thus a ban on chalk is an appropriate means to limit visual impacts with little impact on climbers.

Alternative C - Regulatory

While we support the ban on motorized drills in wilderness, the blanket ban under Alternative C prohibiting all new fixed anchors is unnecessary. As demonstrated in many national parks across the country (some with nearly identical resource considerations like Zion and Joshua Tree), the NPS can allow and support a manageable level of fixed anchor use without impairing Park resources.

Climbing Fees

The Access Fund opposes the provisions outlined in Alternative B related to permit fees. Charging climbers to access to Arches in addition to the entrance fee is unnecessary. Outside of mountaineering parks like Denali and Rainier, it’s not NPS practice to charge a day-use fee for climbing in a national park. This would be a first of its kind and Arches should clarify under what authority this fee would be based, the Federal Lands Recreation Enhancement Act (FLREA) or National Park Service Special Park Uses fee authority found at Director’s Order #53. Climbing in Arches is not served by any amenities as required by FLREA, and Arches currently spends little if any resources on climbing management and thus fails the test for valid cost-recovery as a “Special Park Use.”⁴

Law Enforcement

The monitoring provisions under Alternative C emphasize law enforcement over public education. This approach has proven ineffective at many parks around the country, in particular at Yosemite where a greater focus on education and public outreach in recent years has made a big difference in park-climber relations and compliance with park regulations. Without a demonstrated inability to solve problems through education and public outreach, the ANP should focus its resources instead towards surveys and monitoring, and look to encourage appropriate opportunities for the public to experience the unique environment at Arches. This preferred policy is supported by the “reconnecting Americans to public lands” theme in the America’s Great Outdoor initiative, and the NPS’s own management policies that encourage public opportunities with the closest association to nature.⁵ Accordingly, this CCMP should acknowledge the long standing positive values that climbing brings to Arches.

Alternative D

The Access Fund supports Alternative D with a few key changes.

Trails

The approach in Alternative D for managing access trails could be more strategic. Provisions in Alternative B might be more appropriate which seek to rehabilitate areas and focus routes onto existing trails or hard surfaces. The Park should survey these trails, involving the climbing community, and designate access points and provide maintenance to popular routes. Arches National Park should look to the excellent work done at Joshua Tree National Park, including its wilderness plan,⁶ where NPS managers have provided minimal trail maintenance and signage, while also highlighting and supporting climbing as legitimate and valued park activity by posting interpretive signs about the unique climbing opportunity found at Joshua Tree. Arches National Park should formalize a process to inventory social trails, designate the minimum number of trails needed to access climbing areas, and consider placing physical barriers and signs to protect sensitive resources. The Arches CCMP should also survey “staging areas” at the base of popular climbs to evaluate any restoration, protection, or additional management actions that may be needed.

Fixed Anchors

Since 1989 the Access Fund has worked cooperatively with federal land managers on the appropriate management of fixed climbing anchors in designated wilderness to resolve the issue of how fixed anchors should be managed. We have also negotiated directly with the environmental community to achieve broad support for a national policy which allows, but appropriately manages, the use of fixed anchors in wilderness. We support the majority consensus reached in 2000 by the U.S. Forest Service's Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee which is essentially reflected in Section 7.2 of the draft Director’s Order #41 released in January 2011. The majority consensus position from the Negotiated Rulemaking—later agreed to by the Interagency Wilderness Policy Council—essentially acknowledged that while fixed anchors should be rare, under certain conditions bolts

and pitons are legitimate tools of the wilderness climbing. However, a prior authorization may be required. This basic framework (minimal anchor use may be authorized by individual parks) has for ten years been supported by the Access Fund, American Alpine Club, the outdoor industry, and national environmental and national parks advocacy groups.

The Access Fund believes that 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. The NPS 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 at Arches National Park. Fixed anchors are also a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited. The Access Fund supports the ban on power drills in wilderness, and actively promotes the concept that bolts are a "tool of last resort."

The fixed anchor policy in the CCMP should provide more evidence indicating potential resource impacts as justification for the necessity of a permit system for all new fixed anchor placements. Arches policy should look to the DO #41 draft released by the NPS Washington office as national guidance for the management of climbing in designated wilderness.⁷ One of ANP's alternatives for the CCMP should include an option whereby permits for new anchors are only required in demonstrably sensitive areas. Without evidence that climbing and the minimal use of anchor causes unacceptable impairment, then a better approach would be to survey all known impacts related to climbing, monitor climbing conditions and trends, and identify zones that can be authorized programmatically by this CCMP.

If a permit process is required, ANP should consider whether it has the resources to administer an effective process. The draft CCMP should clearly outline how this process would work and who would be involved. Instead of required permits, ANP could provide for voluntary reporting outside of the backcountry/wilderness zone (as done at Joshua Tree) and a permit new fixed anchors within a designated backcountry/wilderness zone with an emphasis on programmatic authorizations. Other parks that have tried to develop a fixed anchor permit process through a management plan (for example, Joshua Tree National Park's wilderness management plan), but never get around to actually designing and implementing a process thus instituting an endless *de facto* ban. Accordingly, programmatic authorizations are the best way to go where the Park has no specific need for intensive management. Now with the DO #41 about to be completed, fixed anchor authorization options should be more clearly established for local park planners to use when establishing plans such as this CCMP.

Pitons

The Park should allow for very limited amount of direct aid piton use at select locations on a test basis. Arches National Park should provide a planning alternative that allows for the *de minimus* use of removable pitons on only a few classic desert towers with historic significance within the Park. The most historic routes in this category are those found at the Courthouse Towers area.

Climbers have been visiting Arches since the 1960s, before it was a national park, when Argon Tower was first climbed. After nearly 50 years since those first ascents, climbers still seek to repeat the routes first climbed by legendary climbers like Layton Kor, Chuck Pratt, and Bill Forrest. Also, some climbs with the most cutting edge difficult and *minimal use* of pitons for ascent have been completed in Arches' Courthouse Towers area.⁸ 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. Yet a few of these climbs still require the very limited use of pitons for direct aid. Arches National Park should establish a unique permitting category for these historic towers whereby climbers may repeat the very few historic climbs in the Park that require pitons. The Park could then monitor traffic on these select routes to determine whether the policy needs modification.

The Access Fund opposes Alternative D's lack of specific limits for group sizes; it is appropriate that Park planners establish a justifiable limit on group sizes to ensure resource protection.

Actions Common to Alternatives B, C, and D

The Access Fund recommends the following modifications to the common actions proposed in Alternatives B, C, and D:

The "traditional climbing" definition in this section is a mischaracterization. Many traditional climbs have the occasional fixed piton or bolt (many "trad" routes have fixed anchors for rappels or belays), and/or locations for removable pitons. The most elemental characteristic of a traditional climb is that climbers prepared most of their own protection (as compared to sport climbing that is entirely fixed protection). Climbing protection on traditional climbs is placed by the ascending climber and removed by the seconding partner. Traditional climbing can use both "clean climbing" and hammered piton use for protection, and the style can be "aid climbing" or "free climbing." Thus, a park wide ban on "aid" climbing appears uninformed and arbitrary. Aid climbing can occur with less impact than free climbing and thus those climbs should continue. It is also unlikely that ANP can effectively monitor and enforce the difference between aid or free climbing and there is no need to do so in any case.

What the Park appear to be saying in the first paragraph of the "Actions Common to Alternatives B, C, and D" section is that they intend to ban the use of hammered pitons. As noted above, we believe that a ban on even the most minor level of pitons is unnecessary. Again, ANP planners should look to Zion National Park where the NPS has already dealt with a backcountry/wilderness management plan and determined that with respect to pitons and fixed anchors, monitoring and appropriate subsequent management actions as needed is the best approach to protect resources *and* providing access for a legitimate Park activity. Zion has nearly the same kind of "friable rock" that Arches cites as justification for banning piton use, yet Zion wilderness planners allow for that use in areas not otherwise closed to climbing.

The Access Fund supports the current climbing restrictions on any named arch or natural bridge, restrictions near protected cultural sites, and the seasonal closure of specific climbs to protect

cliff-nesting birds. However, Arches National Park has not demonstrated a need to completely ban the use of pitons, and this CCMP should outline appropriate management alternatives to restore the use of these tools necessary for climbing a very small number of historic routes in the Park.

The absolute ban on bouldering park-wide is arbitrary and unnecessary. After a more complete survey of bouldering locations, involving the local community that knows these locations best, the Park should determine where it could allow bouldering with limited potential for impacts to Park resources.

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I hope the above information helps Arches National Park identify appropriate alternatives for the CCMP. Once Arches planners have had a chance to analyze information from this interim phase of the CCMP, it would be helpful for the Park to schedule another open house for the draft phase of this process that is timed during the climbing season. Arches National Park planners are much more likely to gain the insight of the public's perspective if it held an open house or public meeting before the summer season when there is a much higher number of climbers in the Moab area.

The Access Fund looks forward to working with the NPS and any interested parties throughout the CCMP process for Arches National Park. The unique natural environment, world-class character, and long climbing history of Arches underscores the need for appropriate climbing management policies. 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

¹ See the following comment letters:

- <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/UT--Arches%20Climbing%20and%20Canyoneering%20Plan%20-%202010.pdf>
- http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/UT_Arches%20scoping_18_5.1.2007.pdf

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- http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/UT_Arches%20Rule_21_10.19.2006.pdf.

² See the PhD dissertation by Erik Murdock (mostly funded by the NPS), “Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal, and Environmental Implications at Joshua Tree National Park, California.” University of Arizona 2010. This extensive multi-year study found that: 1) relatively small, high-use areas attract the majority of wilderness climbers, 2) very few climbers climb and place fixed anchors in remote wilderness areas, and 3) the placement of fixed anchors in remote wilderness areas attract very few climbers. Hard copy of this dissertation is available upon request.

³ This fixed anchor wilderness policy has been successful at Rocky Mountain National Park for several years. See http://www.nps.gov/romo/parkmgmt/wilderness_backcountry_plan.htm at Section 2.1.4.6.

⁴ Recoverable costs are those costs directly attributable to the use. Costs are recoverable when such costs would not have been incurred if the activity did not take place, or, are necessary, in the judgment of the NPS, for the safe completion of the special park use. See <http://www.nps.gov/policy/DOrders/DO53.htm> and Reference Manual #53 at page C10-3.

⁵ NPS management polices direct planners to provide opportunities for forms of enjoyment that are uniquely suited and appropriate to superlative natural resources. Climbing in Arches offers unique experiences in an environment found nowhere else. NPS policy is to encourage visitor activities that promote enjoyment through a direct association with, interaction with, or relation to park resources without unacceptable impacts to park resources or values.” Climbing in Arches fits this characterization perfectly. See <http://www.nps.gov/policy/mp/policies.html> at Section 8.2.

⁶ See <http://www.nps.gov/jotr/parkmgmt/upload/bcmptext.pdf>

⁷ See Section 7.2 “Climbing” in the draft Director’s Order #41 (found at <http://parkplanning.nps.gov/document.cfm?parkID=442&projectID=34639&documentID=38242>).

⁸ Some of these routes are rated at the highest level of direct aid difficulty. See for example routes first climbed by Jim Beyer on Sheep Rock, Tower of Babel, and The Organ.