

August 27, 2003

Bureau of Land Management
Moab & Monticello Field Office
C/O Bear West
145 South 400 East
Salt Lake City, Utah 84111

**Re: Access Fund Scoping Comments for Indian Creek Corridor
Recreation Plan, UT**

Dear Project Consultants:

The Access Fund welcomes the opportunity to provide scoping comments to the Indian Creek Corridor Plan & Environmental Assessment (Indian Creek Plan), and applauds this renewed effort to provide reasonable management direction for the Indian Creek Corridor.

The Access Fund

The Access Fund is a 501(c)3 non-profit conservation and advocacy organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climbers organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers 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

The Indian Creek Corridor is renowned throughout the world as one of the most outstanding rock climbing areas in America. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, perfectly fractured crack systems, diversity and concentration of climbing routes, and high-quality sandstone. Climbers have been visiting the area since the 1960s. The tower formations (principally North Six Shooter, South Six Shooter and the Bridger Jack Complex) and the multiple parallel crack systems on the canyon walls providing climbs such as "Supercrack," "Coyne Crack" and "The Incredible Hand Crack" – among thousands of others – are regarded as great objectives and form some of the most classic climbs in the country if not the world.

The Access Fund has a proud record of conservation activism at Indian Creek. To support our commitment to Indian Creek we have worked in partnership with the Rocky Mountain Field Institute (RMFI) and The Nature Conservancy (TNC) to identify ways that the special resources at Indian Creek can be preserved. Projects that we have supported, and which have been implemented by RMFI, include a \$7,500 Access Fund Conservation Grant for trail and erosion control work at Bridger Jack and Broken Tooth buttresses. In addition the Access Fund assisted The Nature Conservancy's acquisition of the Dugout Ranch by raising funds towards purchase of the property, and we continue to work with TNC on climbing-related issues in the region. The Access Fund is also spearheading a conservation effort at Indian Creek – called "Save Indian Creek" – which will involve various interested parties and work towards mitigating any recreational impacts at popular camping and hiking sites along the Corridor.

A significant number of the Access Fund's members climb at Indian Creek. With climbers representing perhaps the principle recreation user groups in this the Corridor, the Access Fund would like to offer every assistance towards this revised plan initiative. Following are examples of how the Access Fund has assisted land management agencies in climbing management and general planning initiatives:

- • Advice on visitation, use patterns, and climbing techniques and tools
- • Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletter
- • Helping conduct and/or undertake surveys of climbing activity to determine management preferences
- • 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 a recreation use plan may be appropriate for Access Fund grant support.

The Access Fund recognizes that recreational access must be balanced with proper management (which may include restrictions) to protect the natural and cultural resource values and integrity of the landscape. However, it is important to note that Indian Creek contains some of the most unique, popular, and challenging technical climbing opportunities in the country. The Access Fund is concerned with the preservation of these opportunities, and we provide comments herewith to assess the probable effect of the proposed management initiative.

II. GENERAL COMMENTS

The BLM scoping newsletter notes the need to develop a recreational use plan to manage the various uses and impacts occurring at Indian Creek. From the outset, it is important to note that the primary uses in need of management are camping and hiking. That is, Indian Creek, while a very popular climbing destination, is staggering from impacts due to camping and hiking, not climbing.^{1[1]} Accordingly, this Indian Creek Plan should emphasize the management of camping, parking and hiking activities.

The BLM newsletter seems to emphasize the primacy of cultural and agricultural values at Indian Creek. The Access Fund believes that the scoping process should be objective as possible and not immediately set a hierarchy of use values which may prioritize cultural and agricultural values before the scoping process begins. This is not to say that the absolutely unique and outstanding cultural values of Indian Creek are not important. Similarly, the Access Fund also recognizes the important and central role that the Dugout Ranch plays at Indian Creek. However, the recreational climbing resource at Indian Creek is world-class – as is the camping. Climbers come from all over the world to experience the distinctive crack climbing found at Indian Creek. Indeed, the climbing experiences found at Indian Creek cannot be found anywhere else, and there should be a strong

^{1[1]} It is important to note that my comments here are limited to the area upstream from the Davis Canyon confluence with Indian Creek itself, and are not inclusive of the heavily impacted areas downstream towards Canyonlands National Park which have been highly degraded by off-road motorized vehicles. I assume that the physical scope of the Indian Creek Plan will be the Indian Creek Corridor on both sides of Indian Creek upstream from the Davis Canyon confluence (but inclusive of the Sixshooter Peaks and Hart's Draw) to approximately the old Kelly Ranch site where Indian Creek diverges from Highway 211.

recognition in the Indian Creek Plan that the climbing resource represents an important value that must be accorded a fundamental role in the planning process for Indian Creek. Accordingly, the Plan should state the significance of Indian Creek as a climbing resource and identify management actions to preserve the area's unique climbing experience.^{2[2]} In sum, we feel that all uses should be considered equal during the scoping process so that any one given use is not accorded predominance over another.

III. PRELIMINARY ISSUES IDENTIFIED BY THE BLM AND BEAR WEST

The following Access Fund comments address issues that the BLM and Bear West have identified as preliminary issues to be covered in the Indian Creek Plan.

A. A. Impacts to vegetation from agriculture and recreation

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 prescriptions protecting natural resources. The Indian Creek Plan should clarify how such information will be gathered and a timeline identified for a basic (or comprehensive) inventory of natural resources and associated recreation impacts or potential impacts. The report produced by RMFI may be the best current reference for such data.^{3[3]}

^{2[2]} References which speak to the uniqueness and popularity of Indian Creek among climbers include:

- - Desert Rock –, Eric Bjornstadt, 1987 Chockstone Press.
- - Rock and Road – Rock Climbing Areas of North America, Tim Toula, 1995 Chockstone Press.
- - Rock Climbing Utah, Stuart M Green, 1998 Falcon Press.
- - Indian Creek Climbs, Marco Cornacchione, 1998 Sharp End Publishing.
- - Indian Creek Climbs, Fred Knapp, 1999 Sharp End Publishing.
- - Selected Climbs in the Desert Southwest: Colorado and Utah, Cameron M Burns, 1999 Mountaineers Books.
- - Indian Creek Climbs: An Interim Guide, Fred Knapp, 2002 Sharp End Publishing.
- - Indian Creek: Complete Guide To A Crack Climbing Mecca, David Bloom, (to be published by Sharp End – 2003?).

^{3[3]} See <http://www.accessfund.org/pdf/RMFI-IndianCreekCanyon.pdf>. I understand that there also exists significant BLM data and reports identifying the location of special status fauna, but it's not clear whether the interface between such resources and recreational activity has been

Any analysis of the effects of recreational use on resource values should begin by looking at patterns and levels of use, as well as the location and sensitivity of the resource values. Only once this information has been obtained can a determination be made as to whether any management intervention is necessary for protection of that resource value. If management intervention is required to mitigate climbing impacts we encourage resource managers to work closely with the Access Fund on developing and implementing a consistent management protocol. Our broad experience of working on resource protection issues nationwide can help develop effective management approaches which do not require an intensive commitment of administrative resources.

Significantly, there are federal and state laws and regulations that currently protect sensitive and special status flora. This management authority already provides the BLM with the legal means to implement protective measures that may affect recreational and agricultural use patterns at Indian Creek. Accordingly, it may be unnecessary to specifically address such issues in the Indian Creek Plan. Unless there are specific natural resource-recreation conflicts that are currently identifiable, the Access Fund suggests that the BLM use existing federal and state laws – instead of this Plan – to manage for the protection of special status flora.

B. B. Impacts to raptors and other wildlife from agriculture and recreation

Similarly, the Access Fund supports cultural resource management decisions based on thorough information about the condition of field resources and visitor use. Again, the use of baseline data is critical to making informed decisions when imposing management prescriptions to protect wildlife. The Indian Creek Plan should clarify how such information will be gathered and a timeline developed for a basic (or comprehensive) inventory of cultural resources and associated recreation impacts or potential impacts.

As with natural resources, any analysis of the effects of recreational use on cultural resources values begin by looking at patterns and levels of use, as well as the location and sensitivity of these resource values. Once this information has

appropriately analyzed in the detail needed for identifying management prescriptions for this Indian Creek Plan.

been obtained a determination may be made as to whether any management intervention is necessary for protection of that resource value.

Again, there are federal and state laws and regulations that currently protect sensitive and special status fauna, and this management authority already provides the BLM with the legal means to implement protective measures that may affect recreational and agricultural use patterns at Indian Creek. Accordingly, it may be unnecessary to specifically address such issues in the Indian Creek Plan. Unless there are specific wildlife-recreation conflicts that are currently identifiable, the Access Fund suggests that the BLM use existing federal and state laws – instead of this Plan – to manage for the protection of special status fauna.

C. C. Impacts to private property including littering, safety, and privacy issues

The Indian Creek Plan should clarify the relationship of this plan to the Dugout Ranch. Many climbing opportunities – or access thereto – within the Indian Creek Corridor lie on Dugout Ranch property. The Indian Creek Plan should explain how issues identified in this plan may affect management of the Dugout property. Dugout Ranch manager and former owner Heidi Redd has a long history of friendly accommodation to climbers, including providing both camping and climbing access. It is very appropriate that climbers return the favor by being sensitive to her privacy concerns at the ranch house itself, as well as being respectful of the ranch property and conserving sensitive resources on the ranch and its grazing allotments. The method for ensuring such respect for privacy and ranch resources is perhaps best addressed through the additional sections pertaining to camping, access, and education/outreach provided herein.

D. D. Impacts to water quality, riparian vegetation, stream bank erosion

Issues relating to any recreational impacts to water quality, riparian vegetation and stream bank erosion may best be addressed in the sections herein that speak to camping and human waste. However, there should also be significant attention given to how agricultural practices at Indian Creek affect water quality, riparian vegetation, and stream bank erosion.

E. E. Impacts to visual quality and aesthetics

The visual quality and aesthetics of Indian Creek contribute to the deep personal attachment that many people have for the area. The most common comment made by people interested in the future of Indian Creek is the hope that it remains as primitive as possible. Obviously, with current or increased use patterns some management initiatives must be implemented to mitigate any existing or potential negative recreational impacts. However, the Indian Creek Plan should strive to identify alternatives that maintain the primitive conditions at Indian Creek and preserve the outstanding visual and aesthetic qualities there.

An example of what to avoid at Indian Creek is the infrastructure developed along the River Road upstream from Moab along Highway 128. Although the BLM may have been forced to take drastic measures along the River Road to prevent continued camping impacts there (including significant human waste issues), many people feel that such development measures along the River Road were taken too far, negatively impacting the visual quality and aesthetics there. Although some similar mitigation measures may eventually be needed at Indian Creek, conditions along the River Road are very different from those at Indian Creek (use patterns and numbers, dispersed recreation at Indian Creek as opposed to condensed use along the River Road). The Indian Creek Plan should employ a focus that recognizes the need to balance necessary mitigation measures with the preservation of the primitive quality at Indian Creek. In sum, the River Road should be a model of what *not* to do at Indian Creek.

F. F. Recreation and agricultural user conflicts

The Indian Creek Plan should identify alternatives that mitigate conflicts where recreational users impact the grazing practices of the Dugout Ranch. Such impacts may include pets harassing cattle, and even the denuding of forage in areas that are heavily used such as popular camping sites. Although not really impacting the agricultural practices of the Dugout Ranch, changes in the land – much of which has been caused by intensive camping – especially along the Bridger Jack Road (AKA Moqui Bench) have affected the aesthetics of the region and are of concern to Heidi Redd and others at The Nature Conservancy. The Indian Creek Plan should consider the views of these parties regarding how the unique qualities in the area may be preserved. Likewise, recreational users are significantly impacted by the degraded conditions created by cattle grazing in many areas frequented by climbers, campers and hikers. These areas include the Bridger Jack Road, Superbowl Site, and virtually every riparian area in the corridor. The Indian Creek Plan should consider ways that the outstanding

primitive camping opportunities at Indian Creek may be maintained and not negatively disturbed by the presence of cattle.

G. G. Recreational user conflicts and associated social impacts

There appear to be relatively few conflicts among the various recreational user groups along the Indian Creek Corridor (upstream from the Davis Canyon confluence), although more and more ATVs are venturing into the places that once were primarily visited by low-impact campers. A troubling issue is the increase of motorized recreation in the corridor, including the recently analyzed (and perhaps already approved) “ATV Safari” proposal that will greatly increase motorized traffic through the Bridger Jack area, and undoubtedly encourage further ATV traffic within the Indian Creek Corridor. The BLM should recognize the cumulative impacts of approving such events, and seek ways to mitigate or limit the impacts of such events through the Indian Creek Plan.

H. H. Impacts to cultural and historical resources from agriculture and recreation

Just as with the issues related to protecting flora and fauna noted above, 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 and agricultural use patterns at Indian Creek which may or have already adversely affected such historical and/or cultural resources. As such, it may be unnecessary to specifically address such issues in the Indian Creek Plan other than to implement some pro-active mitigation measures to, for example, preserve rock art adjacent to popular climbing routes. However, unless there are specific cultural resource conflicts with recreation and agriculture that are currently identifiable, the Access Fund suggests that the BLM use existing federal and state laws – instead of this Plan – to manage for the protection of historic and cultural resources.^{4[4]} An exception to this point may be the development of baseline cultural resource data to prevent formalized and permanent camping facilities in areas with significant demonstrable cultural resources.

^{4[4]} The BLM currently has data identifying the locations of cultural resources throughout Indian Creek, and much of this information is sensitive and confidential. Nevertheless, the interface between the location of such cultural resources and recreational activity should be appropriately analyzed in detail before any management prescriptions are identified and imposed under this Plan.

I. I. Access to recreation sites and public lands

Currently there are no major problems related to recreational access in the Indian Creek corridor. However, there are two types of “recreational access” the Indian Creek Plan should consider: climbing access and camping access. At present there exists a fairly large network of user-built trails established by the climbing community to access the various climbing walls within the Corridor. Some of the trails (Bridger Jack, Broken Tooth) have been reinforced or re-routed by efforts by RMFI, approved through the BLM and funded in part by the Access Fund. The Indian Creek Plan should consider whether these trails should be formally acknowledged, and if so determine what level of trail development is appropriate/required, what materials should be used, and what level of maintenance will be regularly needed, if any.

A potentially divisive issue is the extent that current Indian Creek camping locations should remain available. The Indian Creek Plan should develop a range of scenarios that identify the appropriate areas for continued camping within the Corridor. While some may want to significantly reduce available campsites – or simply cluster them altogether – many regular users of Indian Creek go there for the unparalleled camping opportunities and the solitude and beauty that may be obtained at their various favorite sites. The Indian Creek Plan should carefully consider the impacts of reducing the availability of camping at Indian Creek when attempting to minimize potential impacts as many people have strong feelings about the availability of camping at Indian Creek. Likewise, any fee structure for camping should similarly be intensively analyzed to determine the myriad impacts – social and otherwise – that would result from such a development.

Over the last several years a few roads and campsites have been closed off to the public. These include access into Donnelly Canyon and Hog Canyon near the Supercrack Butte. Undoubtedly the Indian Creek Plan will at least consider similar closures to other popular camping sites. The developers of the Indian Creek Plan should be aware that the public that frequents Indian Creek often have their favorite camping sites and will react negatively if these are closed. Accordingly, the Indian Creek Plan should include alternatives that are less restrictive than outright closures, while still being effective in terms of preventing potential negative impacts caused by campers. Likewise, the Indian Creek Plan should include an alternative that seeks an option to an outright fee-for-camping system. Most Indian Creek regulars I know want to ensure that the area remains as primitive as possible. The Indian Creek Plan should reflect this desire by including at least one alternative that maintains existing camping for free. While

in the end this may not be economically practical if mitigation development must be implemented, the recreation community should be provided an opportunity to identify alternate funding sources for managing recreation before a fee system is instigated.

J. J. Parking facility issues

Issues concerning appropriate transportation related facilities (parking, pullouts, etc.) and protection levels for riparian, cultural and other resource values from transportation impacts are all relevant and necessary for consideration in this Plan. The Recreation Plan should consider alternatives for popular parking locations (especially the Supercrack area), and identify ways that parking may be provided that are safe, environmentally sound, convenient, and effective (i.e., climbers will use them). Conflicts with the Dugout Ranch should be minimized, and the Plan should consider guidelines on the extent to which vehicle access or walk in access is desirable and appropriate.

K. K. Restroom facility issues

Human waste disposal is a significant issue at areas that are popular camping and climbing locations. The Plan should provide alternatives that consider whether toilet facilities are required in high use climbing/camping areas.

L. L. Law enforcement issues

Addressing law enforcement issues may not be appropriate for the Indian Creek Plan. Still, the Plan may include alternatives that include pro-active measures such as education informing campers of legal camping limits, that cultural resources should not be touched, and that many special status flora and fauna are legally protected and that there are legal consequences for violations of these laws.

M. M. Safety issues associated with limited parking, flood risk, and falling hazard trees

Let's not make Indian Creek into Disneyland. While parking may incur significant safety hazards at busy roadside locations like the Supercrack Buttress, there is only so much the BLM can do with regards to educating visitors as to flood risks and falling trees. Perhaps the Plan could include alternatives that have some educational components seeking to inform visitors of the dangers of the

outdoors, but besides a few postings at kiosks the BLM probably has better things to do with their limited time and resources than become an outdoor leadership school.

N. N. Impacts to ACECs and Wilderness Study Areas

Education here is key. The typical way to inform the public as to the sensitivities of WSAs or ACECs is to post information at the portals that provide access into these areas. The Plan should provide alternatives that include this type of educational focus.

O. O. Impacts associated with increased camping

The impacts associated with increased camping will be the crux issue of the Indian Creek Plan. As noted above, the Plan should provide a range of alternatives that carefully consider various camping schemes for the Indian Creek Corridor. Camping is an integral part of the climbing experience in the area (it is not a “day-use area”), and the Plan should have as a specific goal the preservation of camping opportunities. The Plan should consider options for dispersed, primitive camping and the designation of some areas for larger numbers of people. In addition, the plan should take into account the climbing community’s preference for semi-primitive camping and low-key, minimally intrusive camping facilities. There has never been any fee for camping in Indian Creek, and this minor agency administration and low-cost aspect of the camping experience is highly valued among climbers. If any fee-for-camping is to be considered, it should be minimal in keeping with the low-key nature of the facilities provided.

IV. IDENTIFICATION OF ADDITIONAL ISSUES

The following are additional issues that the Access Fund believes should be addressed in the Indian Creek Plan.

A. A. Potential over-development of Indian Creek

As noted above, the Indian Creek Plan should seek to identify effective measures that may prevent possible negative recreational impacts. However, the BLM should guard against overreacting to the rise in use at Indian Creek by not

overdeveloping the camping facilities similar to the experience now provided along the River Road upstream from Moab. The Access Fund suggests developing alternatives that have “triggering” mechanisms that could provide a timeline for implementing certain developments (such as toilets) only upon reaching specific forward-looking thresholds, such as overall use numbers or environmental impacts. The use of such “triggers” would work to prevent excessive over-development while at the same time provide authorization for needed mitigation measures.

B. B. Increased ATV use

The ATV Jeep Safari proposed by the town of Monticello (and perhaps already approved by the BLM) will significantly impact the experience of the human-powered recreation community at Indian Creek. The BLM should not be so short-sighted as to think that the impacts of this “safari” will be limited to the days for which the event is permitted. In fact – as is demonstrated by the jeep jamboree weekends in Moab – the cumulative impacts of such a motorized recreation event far outstretch the day of the “safari” itself. If the world-class primitive experience currently found at Indian Creek is to be maintained, the Indian Creek Plan should include alternatives that have measures that significantly protect against an increase in motorized recreation in the area – in particular events that will only promote additional motorized recreation at Indian Creek.

C. C. Education/Community Outreach

Education and community outreach should be the centerpiece of any land management plan that may, in some form, restrict the activities of an established user group. If the Plan will include any alternatives with measures that will restrict camping or access (fees or otherwise), the public must be informed of the need for such changes, and the thoughtful way in which the BLM decided to implement increased management of the area. There is significant distrust of the BLM by the public (possibly as a result of the River Road developments), and the agency faces an uphill battle for “buy-in” by the established users of Indian Creek that a similar River Road situation will not be implemented there. Outreach before, during and after the planning process (during implementation) is critical for easing painful changes that will inevitably occur at Indian Creek. Likewise, continued education of the user group concerning the environment and how/why the area is managed is also important.

The Indian Creek Plan should consider the role that education and public outreach will play in managing climbing and promoting climber stewardship and minimum impact practices. For example: what are the most appropriate materials or techniques that can be used to reach climbers? Where should these techniques and materials be deployed to promote an understanding of resource values and sensitivity? The Indian Creek Plan must include some degree of education/community outreach in each alternative (except of course the “no action” alternative – although arguably there’s currently some degree of education/community outreach being done by the BLM and other interested parties).

Because most recreational users of the Indian Creek Corridor (at least in the area to be managed under this Plan) are climbers, to effectively engage in community outreach at Indian Creek the BLM should consult regularly with a range of climbing interest groups and individuals who have a demonstrated interest at Indian Creek. We recommend that all issues pertaining to climbing in the Indian Creek Corridor, 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 information on specific issues. This approach may also be desirable for consideration of camping, education outreach and human waste issues. The Access Fund would be pleased to help the BLM convene a working group to address climbing issues.

The following organizations/interested parties may be helpful regarding any management planning at Indian Creek:

Interest Groups

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D. D. Sunset Date

The Access Fund notes that the Indian Creek Plan should indicate the duration of the proposed management initiative. Typically such plans have reauthorization dates of five years following plan approval to allow for any necessary revisions. Accordingly, the BLM should provide a time-period specifying the effective duration for this proposed Indian Creek Plan.

V. ADDITIONAL ACCESS FUND ASSISTANCE

The Access Fund works with resource managers across the country, on a variety of public lands, to help protect natural resources in areas visited by climbers. We would be pleased to work more closely with the BLM to identify and mitigate the environmental impacts associated with climbing at Indian Creek. It is the Access Fund's experience that virtually all potential threats or actual impacts to natural and heritage resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions such as seasonal restrictions or (in extreme cases) spatially limited closures. We are familiar with a wide range of resource concerns and appropriate mitigation responses, including erosion, loss of vegetation at staging areas, possible effects on nesting birds and rare species, effects on cliff-top (rim) ecologies, possible conflicts with cultural values, and human waste disposal.

One particular form of assistance the Access Fund is pleased to provide is cooperation with wildlife management programs, in particular protection of federally or state listed species of raptors, bats, and flora which may inhabit the cliffs, access trails, and staging areas of interest to climbers. We are working with resource managers at more than fifty areas around the country to educate climbers about peregrine falcon nesting and seasonal restrictions, which are sometimes imposed to promote peregrine nesting. Please see our website (www.accessfund.org) for a list of all areas currently subject to seasonal restrictions to facilitate raptor nesting. In addition, we have published a handbook for management of climbing in raptor nesting habitat. The Access Fund has also nearly completed a similar handbook on bouldering impacts, and a publication concerning the management of cultural resources is also in the works. More information on these publications is available by contacting Jason Keith at jason@accessfund.org or (435) 259-0693; (303) 545-6772 x102.

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I hope the above information helps the BLM and Bear West identify the appropriate scope for the Indian Creek 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, Bear West and any interested parties throughout the planning process for Indian Creek. The world-class quality and increasing popularity of this sensitive area underscores the urgent need for a comprehensive plan to manage recreation. At the same time, growing interest in local stewardship projects by the climbing public is encouraging and provides a timely opportunity to gain public investment in management policy for this special area.

The Access Fund welcomes any opportunity to offer staff time for participation in planning efforts such as site meetings and focus group discussions as well as assisting with information coordination and liaison with local climbing representatives. We are prepared to commit these and other resources to the preservation and proper recreational use of this unique area.

Sincerely,

Jason Keith
Policy Director
The Access Fund

Cc: Steve Matous, Executive Director, The Access Fund
Access Fund Policy Committee
Scott Berkenfield, Outdoor Recreation Planner,
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