

July 15, 2002

Scott Brown
Chief Ranger
Devils Tower National Monument
P.O. Box 10
Devils Tower, WY 82714

Re: The Access Fund Comments to Devils Tower National Monument regarding National Park Service Scoping Letter for Climbing Management Plan Update

Dear Mr. Brown:

This letter is in response to the your invitation for comments on a scoping letter for the planned Devils Tower National Monument (DTNM) Climbing Management Plan Update (CMPU).

The Access Fund

As you know, The Access Fund is a 501 (c) 3 non-profit advocacy group representing the interests of climbers throughout the United States, and is America's largest national climbing organization with over 15,000 members and affiliates from across the country. We advocate on behalf of approximately one million climbers in the United States. Many of our members climb regularly at Devils Tower.

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. Working in cooperation with climbers, other recreational users, public

land managers and private land owners, the Access Fund promotes the responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

General Remarks

The Access Fund applauds the National Park Service (NPS) for its ongoing efforts to solicit feedback to the evolving climbing management plan at DTNM. The Access Fund hereby requests a copy of the Draft CMPU when prepared later this year.

We note that the CMPU will not propose any major modifications to the 1995 CMP. The Access Fund is encouraged by the significant climber compliance with the voluntary closure to climbing each June and we remain committed to the notion that this management structure best serves the various and diverse interests of the affected parties that visit and use Devils Tower. The Access Fund continues to use DTNM's 1995 CMP as a model for how conflicting interests can compromise effectively.

A remarkable goal of the CMPU is to “[i]ncrease visitor awareness of American Indian beliefs and traditional cultural practices at the Tower.” This goal seems out of place in a *climbing* management plan because not all “visitors” are climbers. Further, by stating the need for increasing this awareness in a CMP, there is an implication that climbers are somehow more objectionable than other visitors to the Tower. If this is the position of the NPS then perhaps such should be analyzed and documented in the Draft CMPU. If such analysis does bear out this statement as true, then perhaps this goal of the CMPU should be altered to “increase *climber* awareness of American Indian beliefs and traditional cultural practices at the Tower.” This objective can be attained through climber education at the required climber registration, on your website, and through on-site signage. DTNM should also consider dedicated signage that is posted only during the month of June when local tribes are conducting their Sun Dance ceremonies at the Tower. For its part, The Access Fund consistently supports Native American freedom of religion and works to educate climbers about Native American beliefs and ceremonies where the practice of these beliefs involves climbing resources or affects climbing access.

The Access Fund is encouraged that DTNM is reviewing and revising its current CMP, as needed. We are further encouraged by the fact that we feel the 1995 CMP needs very little tinkering. This is a testament to the skill and dedication of the working group that devised that plan, and the commitment of the various user groups to making the current system continue. The Access Fund looks forward to working closely with DTNM to revise those aspects of the 1995 CMP that nonetheless do need addressing.

Natural and Cultural Resource Issues

Human Waste

Human waste is an issue to The Access Fund anywhere it's a problem for both aesthetic and environmental reasons. The Access Fund has found that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and alternative conduct that can ameliorate the problem. Perhaps the best opportunity to do this at Devils Tower is during climber registration. Also, posting a Leave No Trace message on the beginning of the approach trail may address human waste and other resource concerns. DTNM should document the extent of this impact prior to or during the review/revision of the CMP, so that any proposed management solutions will be based on objective information rather than assumption that this issue has become a "problem." Again, education of climbers as to human waste issues on the Tower by the NPS will best address this issue.

Visual and Audio Impacts

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 lot at DTNM typically contains large idling buses and crowds of noisy tour groups. Are the audio-visual 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, DTNM should do a comprehensive analysis of both visual and audio impacts at the Tower considering all sources. These impacts can be charted and values can be placed on them. This data, in the end, can help DTNM determine what noises are most problematic, what user groups or natural resources are most impacted, and identify the appropriate solutions to each discrete problem.

It is not clear whether the NPS considers the audio-visual impacts of climbers at DTNM to be an issue meriting management response. If so, then the NPS should document the source of its concern regarding this type of impact. Have other visitors complained about the noises and visual distraction of climbers, and if so how many?

The point in the scoping letter that "[b]rightly colored software (webbing) is an eyesore to many visitors" can be remedied as it is addressed in many other climbing areas across the country: by using camouflaged fixed anchors with attached chains. This method allows the climbers to simply thread the fixed chains for rappelling which in turn entirely negates the need for brightly colored webbing. Both the bolts and chains can be painted the color of the rock thereby becoming practically undetectable to anyone except nearby climbers. To provide for this widespread solution to resolving the visual impact of brightly colored webbing, we recommend that DTNM amend the 1995 CMP's No New Bolts or Fixed Pitons action element to allow for new fixed anchors.^[1] This amendment would provide for new fixed anchors only for significant descent anchors, as determined by the NPS in consultation with the climbing community. This webbing-to-bolt/chains transition may, in many cases, not require new fixed anchors in those locations where

^[1] New bolts such as these almost always can be strategically placed to protect natural resources and limit the chance of ropes getting stuck in cracks when pulling the ropes after a rappel which is not uncommon when rappelling off of fixed pitons placed in cracks.

chains need only be attached to existing fixed anchors in place of previously used webbing. The NPS should consider requesting help from the climbing community for funding a project to replace webbing with chains.

The point in the scoping letter that “[t]he use of hand drills (bolts replacement only), pounding of pitons (traditional aid climbing), and yelling by climbers can disrupt . . . the natural landscape” is a prejudicial statement that has no scientific basis and, we assert, is largely without merit. Where is the evidence (studies from DTNM or other national parks) for this assertion? Moreover, any such assertion should be evaluated in context: how much more “disruptive” are the noises associated with climbing than the noises associated with other park uses such as tour groups, buses and hikers. The Access Fund believes that these audio impacts are either marginal or should be tolerated for the following reasons:

- Because hand drilling only occurs when an anchor is being replaced, this activity is extremely sporadic and rare and can hardly be considered a significant impact.
- The pounding of pitons for traditional aid climbing is an uncommon occurrence at the Tower which, when compared to other user impacts at DTNM, is extremely limited in terms of both time and decibel level. Before DTNM considers the noise caused by hand drilling and piton placement a problem, it should provide some data as to how often these activities occur at the Tower so to analyze these impacts and determine their severity.
- As to “yelling by climbers”, this activity is part of the traditional use of the Tower for over 100 years and is a major safety component of the belay system process. Climbers can no more cease their climbing “signals” than can a tour bus coast up the hill to the parking lot in order to keep its engine noise level down. Again, before asserting that “yelling by climbers” is a significant disruption of the natural landscape, the NPS should do an analysis of this and other audio impacts in the park to provide an objective basis for management action and to reassure all park stakeholders that such statements are not merely an attempt to appease certain constituencies.

Physical Route Manipulation

While resource preservation is an integral component of the NPS mission, the Park Service must also manage to provide for recreational opportunities. Indeed, recreational rock climbing is a historic and celebrated (by the NPS) use of Devils Tower. For every permissible activity on NPS land there is an implied *de minimus* 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; the general public now expects extensive visitor centers and interpretive exhibits.

As noted in the DTNM visitor center, when Rogers and Ripley completed the first ascent of the Tower in 1893, they built a stake ladder up on the Tower’s cracks. Undoubtedly,

these pioneers cleared loose rocks, removed dirt and the odd plant from their ascent crack, and likely scraped off some lichen as they labored upwards. Just as in 1893, climbers today require a *de minimus* amount of disturbance to the natural environment to engage in rockclimbing. Thus, when climbing, climbers occasionally displace rocks, inadvertently remove very minor quantities of vegetation and soil from cracks, and accidentally rub lichen from the rock face (however, this disturbance becomes less and less as a climbing route is climbed more times by subsequent parties). This *de minimus* commitment of resources must be allowed for rockclimbing to continue as a legitimate use of the Tower.

Nonetheless, there exists a limit to the degree of “trundling,” cleaning, and scrubbing that goes beyond what should be considered appropriate. While the accidental dislodging of rocks must be expected in an activity like rockclimbing, intentional trundling must be discouraged—even prohibited. DTNM can address this issue by educating the climbing public as to safety and ecological concerns at registration or through on-site signage. If a climber is found to intentionally trundle large rocks, then DTNM can cite them with a CFR violation that prohibits the negligent endangerment of others. The wholesale removal of organic material from cracks or the rock face should likewise be discouraged or prohibited. DTNM should analyze and document exactly what degree of trundling, cleaning, and/or scrubbing will “result in long term negative effects on the Tower.” Certainly a *de minimus* degree of these activities must be allowed for rockclimbing to continue and will not result in impairment of the resource.

Fixed Anchors

Identifying and implementing a process for bolt replacement is not a significant issue for The Access Fund that we believe must be addressed in this CMPU. Given that the 1995 CMP states that “[t]he decision to replace a bolt at the tower rests with the individual climber . . . [and] the decision to replace a bolt or the choice of equipment is a responsibility the climber assumes” there is no need for the NPS to “specify a decision process or approval process for bolt replacement.” Once the NPS assumes formal approval authority over the *decision* to replace bolts (as opposed to *permitting* the same), the NPS then becomes involved with the safety aspects of that decision—something the 1995 CMP expressly avoids. There seems to be no need for DTNM to get involved in approving bolt replacement, thus increasing its administrative responsibilities. However, if DTNM wanted to keep records of which fixed anchors have been replaced (or are in need of replacement), then perhaps the NPS could simply ask for climbers to report their bolt replacement when climbers sign out at the registration desk.

The Access Fund, would be in favor of an approval process, for the placement of new fixed anchors (as suggested above for new descent anchors). As noted, new fixed anchors could help address unsightly colored webbing and mitigate resource damage caused by rappelling down cracks or crowded over-used descent routes. A simple permit process could be established whereby the party seeking to place new fixed descent anchors submits to DTNM an application verifying either that (1) the new bolts would be replacing a descent anchor currently comprised of fixed pitons (or other fixed anchors

such as stoppers), or (2) the new bolts are being placed at a strategic location that would minimize congestion on other routes, increase safety, or would mitigate natural resource impacts. We suggest there would be no need for climbers to notify the NPS if they were simply replacing unsightly webbing with anchors chains on existing fixed anchors. Again, a permit process for new fixed anchors (used for descent only—not for ascending new routes) would require an amendment to the 1995 CMP that prohibits No New Bolts or Fixed Pitons.

Traditional Aid Climbing

The Access Fund will not consider traditional aid climbing at the Tower to be a significant issue warranting a management response absent objective data proving that this activity causes adverse impacts to the resource. Traditional aid climbing (that places and removes pitons) is a historic and traditional activity of the Tower, and presently occurs rarely. DTNM should survey the number of climbers that employ this style of climbing, consider the location(s) of these climbs, and measure the displacement of inorganic material from piton placement and removal before it determines that the impact of traditional aid climbing rises above a permissible *de minimus* commitment of resources. A progressive management approach might be to establish a zone for traditional aid climbing techniques, however this would localize and thus exacerbate any impacts within this zone. DTNM should strongly consider maintaining this important traditional climbing activity at the Tower, which as a special type of climbing opportunity is not found elsewhere in the region.

Soil and Vegetation Loss

Soil and vegetation loss caused by user-built social trails is a potential issue anywhere recreational users are concentrated. A solution to this problem is for DTNM to amend its GMP and incorporate the obvious and significant climber approach trails (on top and bottom) into the DTNM's formal trail system. This will allow the NPS to address the obvious problems caused by a legitimate use of the resource and conduct trail improvements and maintenance where necessary. Alternatively, DTNM could allow such improvements to be made by climbers, but obviously any approval of trail maintenance of trails not on DTNM's existing system could require expensive and time-consuming NEPA analyses.

As with all resource protection issues, education is the key. DTNM should strive to educate climbers either at registration or through educational signage as to the importance of staying on the trail and all Leave No Trace principles.

Annually, The Access Fund holds an Adopt-A-Crag day at dozens of climbing areas across the country. These are opportunities for the climbing community to volunteer their time, give back to the resource, and engage in stewardship projects at places important to them. The trail issues at DTNM may well serve as a venue for such a project. This initiative would have to be approved by DTNM, and thus may require a special use permits or other special authorization. Please consult our website (www.accessfund.org)

for more information on this program, or call our Events Coordinator Kate Caviccio at 303-545-6772 x10X.

Safety Issues

The Bowling Alley

The Durrance Route on Devils Tower—one of North America’s “50 Classic Climbs”—will always attract a high number of climbers. Many of these climbers are guided and many consist of private parties, but all contribute to the safety hazards in the Bowling Alley area caused by falling debris that is suggested in the scoping letter. DTNM should analyze the extent of this safety hazard, and document the contributing sources of congestion and falling debris (guided v. private parties).

It is The Access Fund’s position that the NPS should continue to let climbers be responsible for their own safety. However, if DTNM feels obligated to mitigate a genuine and documented safety hazard, a couple of solutions are possible:

- • Reduce the number of climbers that must access The Bowling Alley area, either during ascent or descent. If it is apparent that guided climbers are the primary source of this safety hazard, then it should be that discrete user group that is administratively reduced. Likewise, if DTNM determines that it is private climbing parties that contribute disproportionately to safety hazards in the Bowling Alley area, then the NPS should reduce the number of private climbers allowed on any given day. Any quota system should be established for the purpose of addressing climber safety (and thus improving the recreational experience for those with a permit), and reduce numbers as little as possible as necessary to produce a safer experience.
- • Alternatively, a better approach to resolving this problem is for the NPS to approve the establishment of alternate descent anchors. Placing a descent route on each major face of Devils Tower may significantly reduce congestion in the Bowling Alley area, and thus reduce any safety hazards accordingly. These anchors could be established through the new anchor placement permit process suggested above.

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The Access Fund looks forward to working with DTNM and interested parties throughout the CMPU planning process. The Access Fund applauds your efforts thus far in balancing recreational and cultural interests. Again, we consistently cite your work to other land managers as a model for how resource professionals, climbers and Native Americans can work together to produce viable and creative management solutions.

Devils Tower is truly a national treasure. On behalf of the American climbers community, The Access Fund thanks the NPS for soliciting public input on the CMPU and welcomes the opportunity to comment on any changes to the 1995 CMP. The Access

Fund would like to participate in any formal planning efforts such as site meetings and focus group discussions.

The Access Fund hopes the above comments and suggestions are helpful to DTNM in resolving any management issues that the CMPU will address. Please do not hesitate to contact me by telephone, 303-545 6772 x102, or email jason@accessfund.org if you would like more input or to discuss any of the points covered in this letter. We look forward to working with you to maintain climbing opportunities and conserve the climbing environment at Devils Tower.

Sincerely,

Jason Keith
Policy Analyst
The Access Fund

cc: Sam Davison, The Access Fund Executive Director