



December 23, 2019

BLM Bishop Field Office  
Attn: Alabama Hills Management Plan  
351 Pacu Lane, Suite 100  
Bishop, CA 93514

Submitted Via Email to [blm\\_ca\\_alabama\\_hills\\_planning@blm.gov](mailto:blm_ca_alabama_hills_planning@blm.gov):

**RE: Access Fund Comments on Alabama Hills Management Plan Scoping Process**

Dear BLM Bishop Field Office Planning Staff,

The Access Fund and Outdoor Alliance California (OACA) appreciate this opportunity to provide preliminary comments on the BLM's initial scoping process for the Alabama Hills National Scenic Area (NSA) and National Recreation Area (NRA) Management Plan. The Alabama Hills provide a unique and valuable climbing and recreational experience within day trip distance of several major population centers. The distinct history, rich cultural resources, dramatic landscape, and climbing opportunities offered by the Alabama Hills have attracted increasing numbers of visitors, something which the new National Scenic Area designation<sup>1</sup> will compound, leading to a need for proactive management strategies to mitigate growing impacts from recreation. We look forward to collaborating with the BLM on management strategies that protect both the integrity of the land and continued climbing opportunities.

**The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. California is one of Access Fund's largest member states and many of our members climb regularly at the Alabama Hills. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

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<sup>1</sup> Dingell Act: <https://www.congress.gov/bill/116th-congress/senate-bill/47/text>

## **Outdoor Alliance**

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes. Outdoor Alliance California is a statewide partnership that serves as a platform for California outdoor recreation leaders to coordinate efforts to protect public lands, waters and snowscapes, and to ensure these places can be experienced in a meaningful and sustainable manner. Visit, <https://www.outdooralliance.org/>.

## **Comments**

The development of a management plan for the Alabama Hills National Scenic Area (NSA) and National Recreation Area (NRA) will be a complex project which will need to balance the needs of multiple communities and integrate lessons learned from plans of the past along with current conditions, BLM policy, visitor behavior patterns, and public input. We appreciate the BLMs efforts to engage stakeholders early in the planning process. The designation language makes clear that preserving recreational and environmental values is paramount to the management of the Alabama Hills NSA, and also that climbing is a well-established existing use in the area that shall continue under the new NSA status. Access Fund and OACA provide the following scoping comments to assist the BLM in developing a management plan that both meets the new designations purpose and continues to allow sustainable recreation of the Alabama Hills.

## **Sustainable Recreation**

As part of managing sustainable recreation, rock climbing and other forms of existing and appropriate human powered recreation should be clearly identified throughout the plan as appropriate and existing uses in the Alabama Hills NSA. The growth in both general recreation and in climbing means that the BLM must consider how recreation management is integrated into other management activities across the full extent of the Alabama Hills.

## **Fixed Anchor Management**

Rock climbing is considered an appropriate form of recreation on BLM land and in the Alabama Hills.<sup>2</sup> Rock climbing presents BLM land managers with a unique set of management considerations as a result of activity-specific use patterns and equipment. The climbing user group continues to rapidly grow, and throughout the US, land managers collaborate with local

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<sup>2</sup> Top BLM Recreational Climbing Opportunities  
<https://www.arcgis.com/apps/MapSeries/index.html?appid=b93776dfd8be42d190ef90ac53df2121>

climbing communities and national organizations (such as the Access Fund) to steward climbing areas in order to maintain sustainable climbing resources for future generations. The Alabama Hills afford many exceptional and diverse climbing opportunities, and contain a high concentration of moderate, easily-accessed, bolt-protected climbs. Protecting climbing routes with fixed anchors is necessary in the Alabama Hills, as the rock is generally unsuitable for removable gear. Use of fixed anchors in the area has been occurring since at least the 70s, and occasional new route development continues to this day.

We recommend that the Alabama Hills NSA and NRA Plan include provisions that recognize rock climbing as a legitimate activity and the conditional use of fixed climbing anchors as appropriate. Fixed anchors are climbing equipment (e.g. bolts, pitons, or slings) left in place to facilitate ascent or descent of technical terrain, and are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible, or for descents (rappels) that would be otherwise impossible without a fixed anchor.

The vast majority of climbers have never placed a fixed anchor, opting instead to climb established routes, thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor. Fixed anchors, specifically bolts, necessitate long-term maintenance. Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently. Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts.

The use of fixed anchors is permitted on BLM land. There is no CFR within the BLM that prohibits the use of fixed anchors on BLM land. There is ample precedent set for the allowance of fixed anchors on BLM land.<sup>3</sup> The BLM has a policy specifically allowing the use of fixed anchors in wilderness.<sup>4</sup> The BLM Instruction Memorandum No. 2007-084, Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM, recognizes that climbing is a legitimate and appropriate use of BLM Wilderness Areas, and that "climbing, including the use of fixed anchors, has a history that predates the Wilderness Act, and Wilderness Areas represent a unique resource."

In July 2012, the BLM released the revised BLM Manual 6340 concerning the management of designated wilderness areas. This new manual essentially codified the underlying elements of Instruction Memo 007-084, which remains relevant guidance for BLM planners. BLM Manual 6340 states that in designated wilderness "authorizations may be appropriate for ... allowing the placement of permanent, fixed climbing anchors" but that the BLM will "not authorize the public to install permanent, fixed anchors using motorized equipment."

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<sup>3</sup> Top BLM Recreational Climbing Opportunities

<https://www.arcgis.com/apps/MapSeries/index.html?appid=b93776dfd8be42d190ef90ac53df2121>

<sup>4</sup> <https://www.blm.gov/policy/im-2007-084>

Furthermore the S.47 John D. Dingell, Jr. Conservation, Management, and Recreation Act<sup>5</sup> includes language that allows for the conditional placement and maintenance of fixed anchors within the Emery County Public Land Management Act, which is a component of the bill:

“(b) RECREATIONAL CLIMBING.—Nothing in this Act prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this Act—

(1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and

(2) subject to any terms and conditions determined to be necessary by the Secretary.<sup>6</sup>”

The BLM should articulate a clear fixed anchor policy to promote climber safety in the Alabama Hills NSA and NRA. Fixed anchors are unobtrusive, and typically not visible to BLM users, especially when camouflaged. Fixed anchors should be allowed throughout the Alabama Hills (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary. For more information on fixed anchor technology and best practices visit Access Fund’s best practices resource page.<sup>7</sup>

Placement of fixed anchors in the area has typically been self-regulated by the local climbing community. With the new NSA designation comes a higher standard of protection for the Alabama Hills’ outstanding values, leading to a need for basic guidelines around fixed anchor use. There is little precedent for managing fixed anchors in NSAs, with the most salient example being the Columbia River Gorge NSA on the Washington/Oregon border.<sup>8</sup> This NSA, managed by the US Forest Service, has not instituted any regulations on either rock climbing itself or fixed anchor use or placement.

The Alabama Hills NSA legislation makes clear that “the purpose of the Scenic Area is to conserve, protect, and enhance for the benefit, use, and enjoyment of present and future generations the nationally significant scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources of the Scenic Area.” The legislation also specifically highlights rock climbing as one of the many recreational uses that shall continue under the new NSA management scheme.

The continued use and maintenance of fixed anchors is essential to preserving the outstanding recreational value of the Alabama Hills. The placement and replacement of fixed anchors can be done in a way that minimizes user impact and appropriately balances environmental, cultural, and recreational needs. We suggest the following principles be included in the management plan:

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<sup>5</sup> <https://www.congress.gov/bill/116th-congress/senate-bill/47>

<sup>6</sup> <https://www.congress.gov/bill/116th-congress/senate-bill/47>

<sup>7</sup> <https://www.accessfund.org/learn/for-advocates/managing-fixed-anchors>

<sup>8</sup> <http://www.gorgecommission.org/management-plan/plan>

- Do not require an authorization process for the replacement of old or dangerous fixed anchors. Replacing a worn-out fixed anchor often requires little to no new impact to the rock and is necessary for the safety of climbers. Local climbers should be able to replace such anchors at will.
- Recognize power drills as an appropriate and practical tool for placing and maintaining fixed anchors in the front country.
- Work closely with the local climbing community to develop a set of standards and guidelines for the appropriate placement of new fixed anchors in the Alabama Hills. This should include considerations such as rock quality, route quality, proximity to other routes, proximity to roads, proximity to sensitive natural and cultural sites, need for additional routes in a given area, camouflaging bolts, and historical standards/ethics, among others.

### **Monitoring Use Levels, Social Trails, and Development**

Because many climbing formations and boulders lack a formal trail system, climbers have created numerous access paths/social trails. Many of these routes are redundant. Efforts should be made to collect a more comprehensive data set of existing trails and paths to climbing/bouldering formations as well as identifying redundant paths that could be closed, consolidated, and/or restored. The use of visual cues, such as rock lined trails and carbonite signage in additional areas could help reduce off-trail impacts, erosion, and vegetation damage. Better-defined and allocated parking for specific climbing destinations could also help avoid the proliferation of multiple trails originating from different pullouts to reach the same formation.

There is also a need to quantify visitor use levels across all user groups to plan for the long-term management of recreation in the Alabama Hills. Concurrent with this, it is important to identify the type and degree of impact climbers are having on the Alabama Hills that is distinct from impacts caused by general recreation. As rock climbing continues to rapidly grow in popularity it is crucial that the BLM understands the use trends among this specific subgroup of its many visitors, which in turn will help the BLM plan around mitigating climbing-related impacts.

### **Non-motorized Trails**

While the Alabama Hills currently provides extensive opportunities for Off-Highway motorized vehicles and dispersed camping, there are relatively few designated multi-use, non-motorized trails for use by trail-runners, hikers, mountain bikers, equestrians and other user groups, and there is limited connectivity between existing trails. We hope that the BLM will analyze and consider the potential for enhancing a multi-use non-motorized trail system, including by working with regional mountain bike and other user groups to develop a shared stewardship program. The benefits and opportunities of/for connected multi-use non-motorized trails in the Alabama Hills include:

- Health benefits associated with non-motorized recreation
- Dispersing users (current site conditions indicate that the majority of visitors tend to congregate and impact specific sites and destinations)
- Ecological benefits of non-motorized recreation (non-motorized trails create advocates for conservation and sustainable use, as well as providing multi-modal transportation options that reduce carbon-emissions)
- Economic benefits of sustainable recreation (outdoor recreation in the United States is a \$4.2 Billion sector of the economy and contributes substantially to rural, remote communities such as Lone Pine and other Eastern Sierra townships)
- The proximity of the Alabama Hills to the town of Lone Pine provides amenities to recreation-users and economic opportunities to a “Severely Disadvantaged Community” as defined by the State of California

We recommend that the BLM collect a thorough inventory of existing, commonly used non-motorized trails in the Alabama Hills and that opportunities be considered to connect and enhance existing trail segments to create better, more sustainable system trails for the benefit of the users and the integrity of the landscape. The evaluation and consolidation of existing trails as well as linking trails together could create a sustainable opportunity for non-motorized recreationalists to enjoy the Alabama Hills NRA and NSA, while protecting the ecosystem and surrounding sensitive resources.

### **Cultural Resources**

Protecting the Alabama Hill’s cultural resources is a major task, and one that enjoys the proactive support of the climbing community at large. As with threatened natural resources, where mapping indicates that climbing and cultural sites overlap, educational signage (if appropriate), and careful routing of access trails is critical to protecting the zone. The proximity of climbing and cultural resources can be a fantastic opportunity for both on and off-site climber education on the long and rich history of indigenous and other peoples in the Alabama Hills, and also on best practices for climbing near archaeologically or culturally sensitive areas. Where mitigation practices and education are insufficient to protect the resource, site-specific management prescriptions or access restrictions may be appropriate.

### **Scenic values**

The outstanding scenic values and viewsheds of the Alabama Hills were a major impetus for the current NSA designation and require active preservation under the designation language. A unique aspect of this mandate specific to the Alabama Hills is the need to preserve the scenic integrity of historic movie-making locations. A viewshed analysis of the Alabama Hills would be a useful tool in ensuring that recreational uses of all sorts do not impact high-value scenic locations. A thorough inventory of critical viewsheds would help managers plan recreation around movie locations and other scenic areas that may need site-specific protections.

This approach could also inform a zone management strategy, where specific zones within the NSA are set aside to prioritize a particularly outstanding value, scenic or otherwise. Zone management has been used by protected areas with similar terrain, such as Joshua Tree National Park, to match appropriate regulations to areas with varying needs for protection. Zone management is generally a more efficient management tactic than evaluating each individual climbing route or OHV trail (to give two examples) for compatibility with a given sub-area's scenic, natural, and/or cultural resources.

## **Camping and Facilities**

One of the most popular uses of the Alabama Hills across all recreational groups is dispersed camping. With minimal amenities present within the area, waste management has become a corollary problem. Finding toilet paper and human waste at the base of a climb or at any other recreational site in the Alabama Hills is an experience no user group enjoys. Proactive management strategies for both dispersed camping and human waste management are necessary to ensure both the continued quality of the recreational experience within the Alabama Hills, and also the environmental integrity of the NSA/NRA.

While dispersed camping is mandated to continue under the designation language, established sites should be evaluated for compatibility with the protective directives in the law. Sites that have the potential to harm the values laid out in the designation language should be relocated, closed, or otherwise adjusted. Any expansion of existing sites or creation of new sites, intentional or otherwise, should also be carefully regulated to ensure proper placement and mitigation practices. Other strategies, such as creating a designated campground with amenities (including toilets) and a fee, should be considered if sufficient need and buy-in from local stakeholders is present.

Waste management strategies should be tailored to meet site-specific needs and the preferences of local stakeholders. Strategically placed restrooms (whether vault toilets or camouflaged port-o-potties), wag bag distribution, and targeted education and signage on LNT practices for human waste disposal in natural areas are all viable tactics for mitigating the impacts of human waste.

## **Education**

Sustained education is essential to ensure that the growing climbing population can experience the Alabama Hill's exceptional climbing opportunities while respecting and protecting the landscape's cultural and natural resources. Events such as Climber Coffees are excellent potential ways for BLM staff to interact with the community on busy weekends. Partnering with local climbing organizations, guides, gear shops, and other climbing-related businesses is also a proven method for organizing community events and distributing educational materials. Utilizing social media, especially when partnered with climbing influencers with large followings,

is one of the best ways to spread the word on sustainable climbing practices.<sup>9</sup> Access Fund is also more than willing to share its own educational materials, such as our Cimber's Pact,<sup>10</sup> with the BLM.

### Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the BLM may require to provide for the outstanding opportunities found in the Alabama Hills. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>11</sup> or assistance from our Conservation Team<sup>12</sup> which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of these comments on the BLM's scoping process for the Alabama Hills NSA and NRA Management Plan. Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. Access Fund looks forward to continuing to work with the BLM. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone (303) 552-2843 or email ([katie@accessfund.org](mailto:katie@accessfund.org), and [taimur@accessfund.org](mailto:taimur@accessfund.org)) to discuss this matter further.

Sincerely,



Katie Goodwin, California Regional Director - Access Fund



David Page, Chair, California Outdoor Alliance California Policy Shop

Cc:

Chris Winter, Executive Director - Access Fund

<sup>9</sup> See <https://www.instagram.com/p/B2hmUykhox9/>

<sup>10</sup> See <https://www.accessfund.org/learn/the-climbers-pact>

<sup>11</sup> See [http://www.accessfund.org/site/c.tml5KhNWlrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tml5KhNWlrH/b.5000903/k.9722/Grants_program.htm).

<sup>12</sup> See [http://www.accessfund.org/site/c.tml5KhNWlrH/b.7653393/k.AEEB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tml5KhNWlrH/b.7653393/k.AEEB/Conservation_Team.htm).



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