



Protect America's Climbing

August 7, 2013

Dominguez-Escalante NCA  
Bureau of Land Management  
2815 H Road  
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[dencarmp@blm.gov](mailto:dencarmp@blm.gov)

**RE: Access Fund and Western Colorado Climbers' Coalition Comments on Dominquez-Escalante National Conservation Area Draft Resource Management Plan for the Colorado Bureau of Land Management Grand Junction Field Office**

Dear Planning Team:

The Access Fund and Western Colorado Climbers' Coalition welcome this opportunity to comment on the Dominquez-Escalante National Conservation Area Draft Resource Management Plan and Environmental Impact Statement (the "Draft RMP") for the Colorado Bureau of Land Management (the "BLM") Dominquez-Escalante National Conservation Area (the "D-E NCA"). Land encompassed by the D-E NCA contains geologic features that provide unique rock climbing opportunities, ranging from bouldering to traditional multi-pitch climbing. We appreciate the Draft RMP's recognition of climbing as a legitimate recreational activity within D-E NCA boundaries. The Access Fund and Western Colorado Climbers' Coalition remain committed to assisting planners by providing climber management expertise, resources, and community outreach.

**Access Fund**

The Access Fund is the only national advocacy organization with the primary mission of keeping climbing areas open and conserving 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—Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on Federal land.<sup>i</sup> Colorado is the Access Fund's second largest member state and many Access Fund members regularly travel to climb on lands encompassed by the D-E NCA. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## **Western Colorado Climbers' Coalition**

An Access Fund affiliate, the Western Colorado Climbers' Coalition is dedicated to preserving access to western Colorado climbing areas through land stewardship, education and land use advocacy.<sup>ii</sup> The Western Colorado Climbers' Coalition works closely with the staff from the BLM's Grand Junction Field Office to help manage climbing by providing local expertise, educational outreach and organizing volunteer trail work and stewardship events. In fact, the Access Fund and Western Colorado Climbers' Coalition own property located just outside of D-E NCA in Unaweep Canyon, which was purchased in part to help protect access to BLM managed climbing resources. The Western Colorado Climbers' Coalition and Access Fund look forward to strengthening the climber community's relationship with the BLM regarding D-E NCA climbing resources.

### **COMMENTS**

The Access Fund and Western Colorado Climbers' Coalition (WCCC) generally support the D-E NCA Draft RMP Alternative E (agency preferred alternative), including its various Recreation Management Area and Wilderness designations. Alternative E acknowledges rock climbing as a legitimate recreational activity and allows for sustainable and low impact climbing activity in many parts of the D-E NCA. The Access Fund most strongly objects to Alternative C, as this proposed alternative poses a risk to recreational climbing activities within D-E NCA boundaries. While in support of Alternative E, the Access Fund and WCCC hereby offer our concerns regarding potential negative impacts to rock climbing under the BLM's preferred alternative.

#### **Proposed Wilderness Designations**

The Access Fund and WCCC support the proposed boundaries to the Dominguez Canyon Wilderness under the BLM's preferred Alternative E. However, some language in the Draft RMP raises concerns regarding the safety and sustainability of rock climbing within Dominguez Canyon Wilderness. Section 4.4.1 of the Draft RMP, states that restrictions in the Dominguez Canyon Wilderness under all alternatives would include "prohibiting drilling or the use of permanent rock climbing equipment." We support wilderness restrictions that preserve wilderness characteristics and help insure outstanding opportunities for solitude, primitive and unconfined types of recreation. However, this outright ban on all "permanent rock climbing equipment" is vague, unduly restricts climbing and undermines safety without contributing to either solitude or primitive and unconfined recreation. In fact, as written this ban may negatively affect rock climbing and the environment inside the D-E NCA in ways unforeseen or unintended by the developers of the Draft RMP.

Instead, we advocate for management policy that allows for the maintenance and potential installation of new permanent equipment inside the Dominguez Canyon Wilderness via a permitting system. This would allow for the maintenance of existing and development of new climbing routes while allowing the BLM to closely monitor and direct climbing development. Also, semi-permanent anchors made from nylon or steel, that do not require permanent alteration of the rock should be allowed when necessary for safe descent and to reduce harm to cliff-top environments. The Access Fund and WCCC support the ban on mechanized or motorized drills;

hand drills are both adequate for the placement of occasional protection bolts and self-limiting in that the difficulty of placing bolts by hand acts as a deterrence to prolific placement of bolts.

New route permit processes successfully in use at Joshua Tree National Park<sup>iii</sup> (CA), New River Gorge National River<sup>iv</sup> (W. VA), Eldorado Canyon State Park<sup>v</sup> (CO), and Rifle Mountain Park<sup>vi</sup> (CO) are excellent models for allowing responsible development of new routes at Dominguez Canyon Wilderness. In each location, local climbing organizations work with the land manager to review and ultimately help decide which applications should be approved. The Wilderness Act and BLM wilderness management policies allow for such a system to be implemented and the Access Fund and WCCC can help develop and implement an effective new route permit system for Dominguez Canyon Wilderness.

### **BLM Manual 6340**

In July 2012, the BLM released the revised BLM Manual 6340 concerning the management of designated wilderness areas.<sup>vii</sup> This new manual essentially codified the underlying elements of Instruction Memo 2007-084,<sup>viii</sup> which remains relevant guidance for planners at Dominguez Canyon. 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.”<sup>ix</sup>

BLM manages designated wilderness pursuant to the Wilderness Act, which states that these areas shall be administered to “preserve wilderness character.”<sup>x</sup> BLM manages Wilderness Study Areas (WSAs) pursuant to the Federal Land Policy and Management Act (FLPMA), which mandates that the BLM “not impair the suitability” of areas identified as “having wilderness characteristics.”<sup>xi</sup> Therefore, WSAs are to be maintained “in the same or better condition than they were in 1976” when Congress passed the FLPMA. In contrast, BLM manages designated wilderness as to “preserve wilderness character,” something less stringent than the WSAs “not impair the suitability” standard associated with FLPMA.

Designated wilderness areas managed by the BLM are “devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use” in a way that “preserve[s] the wilderness character of the area.”<sup>xii</sup> The Wilderness Act provides four mandatory qualities<sup>xiii</sup> that compose “wilderness character:” 1) untrammeled; 2) natural; 3) undeveloped; and, 4) solitude or primitive and unconfined recreation.<sup>xiv</sup> As further explained below, wilderness climbing, including the responsible use of fixed anchors, exemplifies the type of low impact primitive recreation envisioned by the Wilderness Act. This essential type of wilderness-dependent recreation is thus consistent with the BLM’s mandate to preserve the wilderness character of Dominguez Canyon.

### **Fixed Anchors and Wilderness Character at Dominguez Canyon**

BLM Manual 6340 recognizes that the “human experience of wilderness through solitude or primitive and unconfined recreation is an intrinsic part of wilderness character.” While wilderness areas are managed to preserve wilderness character, BLM policy recognizes that most

uses will result in some change in the condition of the wilderness resource and that “some change is unavoidable” because “most uses will result in some change in the condition of the wilderness resource.”<sup>xv</sup> Wilderness management plans should be developed to define acceptable levels of change to the wilderness resource, and “any change in wilderness character is measured against the benchmark of the conditions generally prevailing in each wilderness at the time of congressional designation.”<sup>xvi</sup> Therefore, management efforts to maintain Dominguez Canyon’s wilderness character should recognize “the benchmark quality of wilderness character” as of 2009 when the United States Congress designated Dominguez Canyon Wilderness.

Management of recreational uses in wilderness is based on three factors: maintaining solitude, maintaining a primitive setting, and keeping recreation as unconfined as possible. Thus, planners should develop a new route permit process that manages fixed anchors without impairing the wilderness character of Dominguez Canyon. In particular, the permit process can consider the range of climbing use patterns and potential impacts to determine whether approving a new route application would comport with the untrammeled, natural, and undeveloped character of Dominguez Canyon Wilderness, and provides opportunities for solitude or primitive and unconfined recreation.

BLM Manual 6340 notes that “‘untrammeled’ refers to wilderness as essentially unhindered and free from modern human control or manipulation. This quality is impaired by human activities or actions that control or manipulate the components or processes of ecological systems inside wilderness.”<sup>xvii</sup> Fixed anchor use, other than sometimes preventing impacts to cliff top ecologies, does not control or manipulate ecological systems in wilderness. Thus, climbing activities and a responsible use of fixed anchors will not affect the untrammeled character of Dominguez Canyon Wilderness.

The Wilderness Act requires that wilderness be “protected and managed so as to preserve its natural conditions,” and as Manual 6340 explains further, “wilderness ecological systems should be as free as possible from the effects of modern civilization” and management must ensure that “ecosystems and ecological processes continue to function naturally.”<sup>xviii</sup> As with “untrammeled,” the new route permit process will have no effect on ecosystems and ecological processes in Dominguez Canyon Wilderness (other than mitigating potential related climbing impacts), and thus the controlled use of new fixed anchors at Dominguez Canyon will not impair its natural character.

The Wilderness Act also requires that wilderness remain “undeveloped” and that it preserves “its primeval character and influence” and “with the imprint of man’s work substantially unnoticeable.”<sup>xix</sup> Used appropriately, wilderness climbing fixed anchors are unnoticeable except to those wilderness climbers that are seeking them out. Therefore, fixed anchors are a substantially unnoticeable imprint caused by this fundamental wilderness recreation use.

The Wilderness Act states that wilderness has “outstanding opportunities for solitude or a primitive and unconfined type of recreation.”<sup>xx</sup> Solitude is the sense of being alone or remote from the sights and sounds of other people; it is the experience of a lonely, unfrequented, or secluded place. Primitive recreation encompasses dispersed and undeveloped recreational opportunities that are appropriate in wilderness and require neither facilities nor motorized

equipment. This sense of solitude has long been acknowledged as an important component of the wilderness experience. A new route permit process will help mitigate impacts and increase the opportunity for solitude by increasing the number of routes accessible to climbers when appropriate.

Wilderness climbing and the controlled use of new fixed anchors has no effect on ecological systems, other than to prevent potential impacts, thus ecological processes continue to function naturally regardless of fixed anchor use. Therefore, not only will a new route permit process at Dominguez Canyon have no negative impacts on the BLM's ability to preserve the area's wilderness character, but allowing the use of new fixed anchors will facilitate the BLM's ability to provide for an "intrinsic part of wilderness character"—opportunities for solitude through a longstanding type of primitive and unconfined recreation.

### **Minimum Tool**

We believe that when placed by hand after approval, new fixed anchors are a "minimum tool" necessary for the administration of wilderness recreation. Some practices related to fixed anchors outside of wilderness, however, are not the "minimum tool." For example, power drills are banned by the Wilderness Act and removable bolts are unproven and likely impractical, thus both of these practices are clearly not an acceptable minimum tool for managing fixed anchors in Dominguez Canyon Wilderness. The minimum tool required to safely and successfully place new and replace existing fixed anchors in Dominguez Canyon is a hand drill, which necessitates a higher degree of both skill and difficulty. Thus, requiring this arduous hand-drilling method coupled with a new route permit process will limit the proliferation of new bolts yet still allow a minimum number for the administration of unrestrained backcountry climbing at Dominguez Canyon.

### **Proposed Recreation Management Area Designations**

While rock climbing is specifically addressed in the RMA concerning both the proposed East Creek Extensive Recreational Management Area (herein "East Creek ERMA") and the proposed Escalante Canyon Special Recreation Management Area (herein "Escalante Canyon SMRA"), there is no mention of rock climbing in other proposed recreation management areas that are known or suspected to contain climbing resources. We realize that these omissions are not dispositive of the allowance of climbing in the respective area. However, the Access Fund and WCCC want the BLM to be aware of this potential oversight. Specifically, (1) the proposed Ninemile Hill Extensive Recreation Management Area (herein "Ninemile Hill ERMA") is known to contain bouldering and some traditional climbing resources, and (2) the Cactus Park Special Recreation Management Area (herein "Cactus Park SRMA") is suspected of containing additional rock climbing resources. Other recreation management areas proposed under Alternative E but not mentioned above may also contain rock climbing resources.

The Access Fund and WCCC strongly believe that climbing should continue largely unrestricted in these areas. Properly managed, rock climbing is a low impact sport that does not interfere with other recreational groups' use of these areas. Plus, maximizing the area of land on which climbing is an accepted use means that the volume of climbers who use the D-E NCA will be

dispersed over a larger land area, further reducing the already low impact that climbing activities have on the environment. Ultimately, the Access Fund and WCCC are advocating that rock climbing be acknowledged as an appropriate use subject to reasonable restrictions to protect resources in all designated recreation management areas within the D-E NCA.

### **Access Fund and Western Colorado Climbers' Coalition Assistance**

Please contact Access Fund and WCCC for assistance with developing climbing management policies for the D-E NCA. The Access Fund's publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*<sup>xxi</sup> and website, <http://www.climbingmanagement.org>, have both proven to be useful tools for land managers across the country. The Access Fund, Western Colorado Climbers' Coalition, and the climbing community are ready, willing, and able to help planners implement and prioritize climbing related programs or projects during implementation-level planning. In addition, some aspects of this planning initiative may qualify for funding from the Access Fund Climbing Preservation Grant Program<sup>xxii</sup> or assistance from our Conservation Team,<sup>xxiii</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 climbing management for the D-E NCA. The Access Fund and WCCC look forward to participating throughout the entire planning process. Please keep us informed as this planning process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email ([rd@accessfund.org](mailto:rd@accessfund.org)) to discuss this matter further.

Best Regards,



s/ Jesse Zacher

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Scott Massey, American Mountain Guides Association

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<sup>i</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration\\_with\\_federal\\_agencies.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm)

<sup>ii</sup> <http://westernslopeclimbers.blogspot.com>

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iii [http://home.nps.gov/jotr/planyourvisit/fixed\\_anchors.htm](http://home.nps.gov/jotr/planyourvisit/fixed_anchors.htm)

iv <http://www.nps.gov/neri/planyourvisit/upload/9-New-or-Update-Climbing-Route-Permit-Application.pdf>

v

<http://www.parks.state.co.us/Parks/EldoradoCanyon/ParkActivities/RockClimbing/ActionCommitteeForEldorado/Pages/ActionCommitteeForEldorado.aspx>

vi <http://www.rifleclimbers.org/BoltingPermits.aspx>

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[http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.222.69.File.dat/6340.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.222.69.File.dat/6340.pdf)

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[http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2007/im\\_2007-084\\_.print.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2007/im_2007-084_.print.html)

ix *See* BLM Manual 6340 at 1-42.

xx *See* BLM Manual 6330 at 1-6,

[http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.319.15.File.dat/6330.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.319.15.File.dat/6330.pdf)

xi *See* BLM Manual 6330 at 1-6,

[http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.319.15.File.dat/6330.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.319.15.File.dat/6330.pdf)

xii *See* BLM Manual 6340 at 1-7.

xiii A fifth optional quality is “unique, supplemental, or other feature” which includes areas that “may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” BLM Manual 6340 at 1-6.

xiv *Id.* at pp. 1-5 to 1-6.

xv *See* BLM Manual 6340 at 1-10.

xvi *See* BLM 6340 at 1-10.

xvii *See* BLM Manual 6340 at 1-5.

xviii *Id.*

xix *Id.*

xx *Id.* at 1-7.

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

xxii [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)

xxiii [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)