



May 15, 2013

ATTN: Sendi Kalcic, Wilderness Specialist  
Bureau of Land Management  
Las Vegas Field Office  
4701 N. Torrey Pines Drive  
Las Vegas, NV 89130  
[lvwilderness@blm.gov](mailto:lvwilderness@blm.gov)

**RE: Access Fund, Las Vegas Climbers Liaison Council, and Southern Utah Climbing Alliance Comments to Arrow Canyon Wilderness Draft Wilderness Management Plan and Environmental Assessment**

Dear Ms. Kalcic and Planning Team:

The Access Fund, Las Vegas Climbers Liaison Council,<sup>1</sup> and Southern Utah Climbing Alliance<sup>2</sup> appreciate this opportunity to provide comments to the Bureau of Land Management's (BLM) *Arrow Canyon Draft Wilderness Management Plan and Environmental Assessment* (the Plan). Climbing at Arrow Canyon began over two decades ago and provides world class sport climbing opportunities. We are encouraged that the Plan acknowledges climbing as an appropriate and historic use of Arrow Canyon Wilderness, but are extremely concerned that it prohibits the placement of all new fixed anchors. Prohibiting new bolts completely is unnecessary and limits the BLM's ability to mitigate impacts to the areas with existing routes. As explained in detail below, a permit system to approve new routes is a superior alternative and examples successfully in use across the country can be a model for Arrow Canyon.

### **The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 11,000 members and affiliates. The Access Fund partners with the BLM,<sup>3</sup> Forest Service, National Park Service, and US Fish & Wildlife Service on the national and local levels to provide climbing management expertise, stewardship, project specific funding, and educational outreach. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how climbing will be managed on federal land.<sup>4</sup> Nevada is one of our largest member states and many of our members from Nevada and around the country regularly travel to climb at Arrow Canyon.

Since 1989, the Access Fund has been working with all of the federal agencies, including the BLM, to resolve the issue of how fixed anchors will be managed in designated wilderness. We negotiated directly with land managers and the conservation community to achieve broad support for a national policy which allows, but limits, the use of fixed anchors in designated wilderness. The Access Fund has a long record of conservation and climber activism nationally and at Arrow Canyon. We work closely with local climbers across the country, including the Las Vegas Climbers Liaison Council and Southern Utah Climbing Alliance to be leaders in developing appropriate policy for managing fixed anchors in wilderness and non-wilderness areas. In Nevada alone, we have participated in several wilderness planning initiatives including Lake Mead National Recreation Area Wilderness Plan (2010 and 2012), Arrow Canyon Wilderness Management Plan (2010), Red Rock Canyon National Conservation Area Wilderness Plan (2007), and Red Rock National Conservation Area Wilderness Fixed Anchor Management Plan (2012).<sup>5</sup>

Regarding wilderness climbing and fixed anchor management, the Access Fund believes that:

- Climbing is a low-impact primitive recreational activity that, when managed properly, does not degrade wilderness characteristics.
- Some level of fixed anchor use must be allowed wherever climbing is allowed. The appropriate level of use should be established on an area-by-area basis.
- The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide.
- Climbers, guided by clear policy and local ethics, bear the primary responsibility for determining when to place and replace fixed anchors and how to use these tools.
- Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited.

For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## COMMENTS

Arrow Canyon Wilderness contains Arrow Canyon Range, one of the most scenic ranges in southern Nevada. The western face of the range is a spectacular cliff marked with dramatic bands of quartzite and limestone. Most of the climbing occurs in a narrow box canyon near the boundary of Arrow Canyon Wilderness. Due to the nature of the rock, the majority of climbing in Arrow Canyon requires the use of fixed anchors (bolts) for protection and retreat. We applaud the BLM for acknowledging sport climbing as a legitimate use of Arrow Canyon Wilderness<sup>6</sup> and providing reasonable policies for bolt replacement.<sup>7</sup> Las Vegas Climbers Liaison Council will continue to assist the BLM with bolt replacement and the Southern Utah Climbers Alliance is also willing to help the BLM implement the bolt replacement policies within the Plan.

Unfortunately, the Plan prohibits the placement of new fixed anchors effectively eliminating the opportunity to develop new climbing routes and reducing the ability to mitigate impacts near existing routes. The Plan states: “Climbing routes and previously installed permanent fixed

anchors in Arrow Canyon would be limited to those existing at the time of publishing this plan...<sup>8</sup> While we appreciate the opportunity to access and maintain existing climbs, totally prohibiting new routes is not the best means for protecting wilderness characteristics or to provide solitude and primitive and unconfined recreation.

The Plan cites one published guide for the proposition that there are “51 technical climbing routes in Arrow Canyon in addition to a few without permanent anchors.”<sup>9</sup> Based on the latest research by members of the Southern Utah Climbers Alliance, the number of existing routes in Arrow Canyon is closer to 76 (*see attached PDF-Existing Arrow Canyon Routes*)<sup>10</sup> and the area has the potential to develop at least 100 more. Climbing’s popularity continues to rise and places like Arrow Canyon are going to be used by more climbers. Limiting climbing to existing routes will likely increase impacts to existing routes as more and more climbers visit Arrow Canyon. Allowing some level of new route development will protect wilderness characteristics by dispersing the associated impacts and by providing the opportunity for more primitive and unconfined recreation.

New route permit processes successfully in use at Joshua Tree National Park<sup>11</sup> (CA), New River Gorge National River<sup>12</sup> (W. VA), Eldorado Canyon State Park<sup>13</sup> (CO), and Rifle Mountain Park<sup>14</sup> (CO) are excellent models for allowing responsible development of new routes at Arrow Canyon. In each location, local climbing organizations work with the land manager to review and ultimately 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, Las Vegas Climbers Liaison Council, and Southern Utah Climbing Alliance can help develop and implement an effective new route permit system for Arrow Canyon.

### **BLM Manual 6340**

In July 2012, the BLM released the revised BLM Manual 6340 concerning the management of designated wilderness areas.<sup>15</sup> This new manual essentially codified the underlying elements of Instruction Memo 2007-084,<sup>16</sup> which remains relevant guidance for planners at Arrow 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>17</sup>

BLM manages designated wilderness pursuant to the Wilderness Act, which states that these areas shall be administered to “preserve wilderness character.”<sup>18</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>19</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>20</sup> The Wilderness Act provides four mandatory

qualities<sup>21</sup> that compose “wilderness character:” 1) untrammeled; 2) natural; 3) undeveloped; and, 4) solitude or primitive and unconfined recreation.<sup>22</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 Arrow Canyon.

### **Fixed Anchors and Wilderness Character at Arrow 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>23</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>24</sup> Therefore, management efforts to maintain Arrow Canyon’s wilderness character should recognize “the benchmark quality of wilderness character” as of 2002 when the United States Congress designated Arrow Canyon Wilderness.<sup>25</sup>

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 Arrow 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 Arrow 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>26</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 Arrow 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>27</sup> As with “untrammeled,” the new route permit process will have no effect on ecosystems and ecological processes in Arrow Canyon Wilderness (other than mitigating potential related climbing impacts), and thus the controlled use of new fixed anchors at Arrow 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>28</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>29</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 increase the number of routes accessible to climbers.

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 Arrow 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 Arrow Canyon Wilderness. The minimum tool required to safely and successfully place new and replace existing fixed anchors in Arrow 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 Arrow Canyon.

### **Access Fund, Las Vegas Climbers Liaison Council, and Southern Utah Climbing Alliance Assistance**

Please contact us for assistance with developing and implementing a new route permit process for Arrow Canyon Wilderness. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* has proven to be a useful tool for land managers across the country<sup>30</sup> as well as our website [www.climbingmanagement.org](http://www.climbingmanagement.org). In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>31</sup> or assistance from our Conservation Team,<sup>32</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. The climbing community and the Access Fund are

ready, willing, and able to help planners develop and implement an effective new route permit process for Arrow Canyon Wilderness.

\* \* \*

Overall, the Plan's climbing management policies are reasonable, and subject to the addition of a new route permit process, we fully support the Plan's well-balanced approach. Thank you for considering a new route permit process for Arrow Canyon Wilderness. The Access Fund, Las Vegas Climbers Liaison Council, and Southern Utah Climbing Alliance have the experience, local contacts, and resources to help planners craft and implement a new route permit process that encourages climbing while preserving Arrow Canyon Wilderness characteristics. Please keep us informed as the 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 Javier Wasiak



R.D. Pascoe  
Policy Director  
Access Fund

Javier Wasiak  
President  
Las Vegas Climbers Liaison Council

/s Misty Murphy

Misty Murphy  
Executive Director  
Southern Utah Climbing Alliance

Cc: Brady Robinson, Access Fund, Executive Director  
Scott Massey, American Mountain Guides Association

---

<sup>1</sup> The Las Vegas Climbers' Liaison Council (LVCLC) is dedicated to ensuring climbing access, encouraging stewardship of the environment, and cultivating a sense of community in a world-class climbing destination. The LVCLC is supported and recognized by the Access Fund, the American Safe Climbing Association, the American Mountain Guides Association, and many other climbing organizations that give back to the climbing community through numerous efforts. The LVCLC is a non-profit organization (501(c)(3)), and we operate completely through the efforts and financial support of the climbing community and businesses who recognize the importance of environmental stewardship and climbing access. Funds raised go directly to supporting our mission. In an effort to maintain our operational budget, the LVCLC is operated by a completely volunteer board. *See* <http://www.facebook.com/pages/Las-Vegas-Climbers-Liaison-Council/106333446111670#!/pages/Las-Vegas-Climbers-Liaison-Council/106333446111670>

<sup>2</sup> The Southern Utah Climbing Alliance was formed to help protect the places we all love. In response to increased traffic at both bouldering areas and sport climbing areas, we must proactively consider strategies to maintain the quality of, and access to these areas. These initiatives include, but are not limited to: Maintaining access to areas by working with land management agencies; Re-bolting sport climbs where safety of bolts is a concern; Cleaning and maintaining areas where traffic is booming; and, Organizing and staging cleanup events. *See* <http://southernutahclimbing.org/>

---

<sup>3</sup>The BLM's Climbing Program notes that BLM maintains a strong partnership with the Access Fund, a non-profit advocacy group that works with federal, state and local officials; local climbing organizations; and land managers to develop and guide climbing management policies for public and private lands. The Access Fund hosts two excellent websites: [www.accessfund.org](http://www.accessfund.org), a general resource for climbers, and [www.climbingmanagement.org](http://www.climbingmanagement.org) a site now in development that will provide good information for organizations that manage climbing. See [http://www.blm.gov/wo/st/en/prog/Recreation/recreation\\_national/Climbing.html](http://www.blm.gov/wo/st/en/prog/Recreation/recreation_national/Climbing.html).

<sup>4</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>5</sup>For our specific comments on these various Nevada management plans, see [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5050525/k.11DB/Position\\_statements.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5050525/k.11DB/Position_statements.htm).

<sup>6</sup> *Arrow Canyon Wilderness Draft Wilderness Management Plan and Environmental Assessment, April 12, 2013* at p. 7, 14, 15, 16, and 29.

<sup>7</sup> *Id.* at p. 29-30.

<sup>8</sup> *Id.* at p. 29.

<sup>9</sup> *Id.* at p. 15.

<sup>10</sup> For the most up to date list of existing bolted routes in Arrow Canyon, see attached PDF. A new guide book for Arrow Canyon is in the process of being released.

<sup>11</sup> See [http://home.nps.gov/jotr/planyourvisit/fixd\\_anchors.htm](http://home.nps.gov/jotr/planyourvisit/fixd_anchors.htm)

<sup>12</sup> See <http://www.nps.gov/neri/planyourvisit/upload/9-New-or-Update-Climbing-Route-Permit-Application.pdf>

<sup>13</sup> See <http://www.parks.state.co.us/Parks/EldoradoCanyon/ParkActivities/RockClimbing/ActionCommitteeforEldorado/Pages/ActionCommitteeForEldorado.aspx>

<sup>14</sup> See <http://www.rifleclimbers.org/BoltingPermits.aspx>

<sup>15</sup>[http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.22269.File.dat/6340.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.22269.File.dat/6340.pdf).

<sup>16</sup> See [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)

<sup>17</sup> See BLM Manual 6340 at 1-42.

<sup>18</sup> See BLM Manual 6330 at 1-6, [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.31915.File.dat/6330.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.31915.File.dat/6330.pdf).

<sup>19</sup> See BLM Manual 6330 at 1-6, [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\\_Resources\\_Management/policy/blm\\_manual.Par.31915.File.dat/6330.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.31915.File.dat/6330.pdf).

<sup>20</sup> BLM Manual 6340 at 1-7.

---

<sup>21</sup>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.

<sup>22</sup>*Id.* at pp. 1-5 to 1-6.

<sup>23</sup>See BLM Manual 6340 at 1-10.

<sup>24</sup>BLM 6340 at 1-10.

<sup>25</sup> The *Clark County Conservation of Public Land and Natural Resources Act of 2002* protected 18 wilderness areas near Las Vegas as part of the National Wilderness Preservation System, and created Arrow Canyon Wilderness Area.

<sup>26</sup>BLM Manual 6340 at 1-5.

<sup>27</sup>BLM Manual 6340 at 1-5.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.* at 1-7.

<sup>30</sup><http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

<sup>31</sup>[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>32</sup>[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).