



November 15, 2018

Bears Ears National Monument Planning Effort
P.O. Box 7
Monticello, Utah 84535
Email: [blm ut monticello monuments@blm.gov](mailto:blm_ut_monticello_monuments@blm.gov)

RE: Access Fund Comments to Management Plans for the Indian Creek and Shash Jaa Units of Bears Ears National Monument

BLM Planners:

Access Fund, Salt Lake Climbers Alliance, and Friends of Indian Creek (the “Climbing Organizations”) welcome this opportunity to provide input in the planning process for the Draft Monument Management Plans (MMPs) for the Shash Jaa and Indian Creek units of the Bears Ears National Monument (BENM).

This planning area contains Indian Creek, a world-class climbing area attracting thousands of climbers from across the United States and internationally each year. This plan also affects important remote wilderness climbing areas such as Arch Canyon located within the Shash Jaa unit of the BENM. The Climbing Organizations’ members regularly climb at these locations, and we have provided climbing management funding, expertise and labor for stewardship projects, and community outreach throughout this planning area to assist the BLM with stewardship projects and ensure the appropriate management of the iconic climbing resources found within BENM.

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 7 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 nearly 20,000 members and 120 affiliates. We currently hold memorandums of understanding¹ with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how climbing is managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach for climbing areas across the country including the BENM region, and Utah is one of our largest member states. For more information about the Access Fund, visit www.accessfund.org.

Salt Lake Climbers Alliance

The Salt Lake Climbers Alliance (SLCA) is a 501(c)(3) non-profit organization that exists to provide a unified voice for climbers in Utah’s Wasatch area through advocacy, stewardship,

community, and education. BENM is a world-class climbing area that many Utahns travel to every weekend, including SLCA members. BENM attracts thousands of climbers from across the United States and internationally each year. The appeal is not only the quality of the rock climbing, but also the vastly undeveloped landscapes that make up the southern Utah desert. The SLCA is dedicated to the protection, management, and stewardship of these valuable recreational resources. For more information, see www.SaltLakeClimbers.org.

Friends of Indian Creek

The Friends of Indian Creek (FOIC), a 501(c)(3) organization, works with land managers to promote responsible climbing, and provides resources that help alleviate recreation's impact throughout southeastern Utah. Founded in 2005, the mission of the Friends of Indian Creek is to promote responsible recreation to ensure the conservation of Indian Creek's natural resources and primitive character. In 2012, the FOIC expanded its geographic scope to include the many climbing resources also found in the larger Moab, Utah region. For more information about FOIC, see https://www.facebook.com/pg/friendsofindiancreek.org/about/?ref=page_internal.

Climbing Community Conservation Efforts at Indian Creek

For nearly twenty years, Access Fund's policy program has worked on land management issues throughout the State of Utah and the Bears Ears region specifically, including participation as a leading stakeholder in several BLM planning initiatives and various legislative proposals affecting southeastern Utah. Access Fund has worked in the Indian Creek area since the late 1990s, and we've participated in several regional public land initiatives including the BLM 2004 Indian Creek activity plan, the BLM's Moab and Monticello 2008 Resource Management Plans, the 2016 Moab Master Leasing Plan, and other planning, management and stewardship initiatives.

In addition, Access Fund staff served on county committees and represented climbing and other recreation interests for three years during the Utah Public Land Initiative (PLI). Following the failed PLI legislative effort, Access Fund advocated for climbers during the process leading to the December 28, 2016 Proclamation 9558 establishing BENM,² which acknowledged "rock climbing" as providing "world class recreation" within the monument. This acknowledgment of rock climbing in the BENM proclamation is significant because it confers a prominent stakeholder role in planning for BENM due to the world-class quality of the climbing resource and experience found only at Bears Ears, in particular the Indian Creek corridor.

Access Fund has been a leader in stewardship projects at Indian Creek since the late 1990s, providing funding, trail planning and construction expertise for several projects throughout the Indian Creek corridor. Since 2003, Access Fund has committed over \$50,000 to stewardship and conservation efforts throughout Indian Creek in the form of grant funds dispersed to partner organizations through the Access Fund Climbing Conservation Grant Program. These funds have helped cover costs for vault toilet installations, kiosks/signage and trail crew resources. In addition to grant awards, Access Fund has committed staff time for management planning, land conservation efforts and trail crew resources. This work and support from the Access Fund and our partners such as the Friends of Indian Creek, Salt Lake Climbers Alliance and American

Alpine Club has resulted in improved parking areas, three weeks of annual volunteer stewardship initiatives, approximately five miles of sustainable climbing access trails, improved human waste management including the installation of vault toilets and funding for a “wag bag” program, and assistance towards cultural resource protection.

Access Fund’s most recent project at Indian Creek was this year’s “Work Week in the Creek,” a cooperative effort by Access Fund partners like the Front Range Climbing Stewards, Rocky Mountain Field Institute, Friends of Indian Creek and the local Monticello BLM office to rebuild the approach trail to the popular Scarface Wall climbing area. The Climbing Organizations are dedicated to continuing their deep rooted support for the protection of the valuable resource throughout Indian Creek and the entire Bears Ears National Monument, and this MMP should assess current and future use patterns at Indian Creek and throughout this planning area to plan for any new trails needed and to authorize the enhancement of existing trails.

Climbing Resources in the ‘Indian Creek and Shash Jáa’ Units of Bears Ears National Monument Planning Area

The Indian Creek Corridor is one of the most popular climbing areas in the United States and is renowned as one of the world’s most unique and inspiring rock climbing experiences. Climbers are drawn to the region’s unique combination of scenic beauty, remarkable landscape, perfectly fractured crack systems, diversity and concentration of climbing routes, and high-quality compact sandstone—a combination found nowhere else. Climbers have been visiting the area since the 1960s establishing world famous tower climbs such as the *Lightning Bolt Cracks on North Six Shooter Peaks* and many parallel-sided crack systems on the canyon walls such as *Supercrack*, *The Incredible Hand Crack*, *Scarface* among thousands more.³ Accordingly, Proclamation 9558⁴ declares

[t]he area contains numerous objects of historic and of scientific interest, and it provides world class outdoor recreation opportunities, including **rock climbing**, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. Because visitors travel from near and far, these lands support a growing travel and tourism sector that is a source of economic opportunity for the region. (emphasis added)

The scenic quality, ecological integrity, traditional values and cultural resources of Indian Creek contribute to the deep personal attachment that many people have for the area. Most climbers agree that Indian Creek should remain as primitive as possible, yet most also agree that increased use-levels necessitate management strategies that mitigate recreation impacts.

Accordingly, we believe that the BLM should select a management direction in this plan that maintains the primitive character of Indian Creek, preserving its outstanding landscape qualities. The Climbing Organizations believe that the BLM should also consider the unique and world-class climbing opportunities at Indian Creek when developing management alternatives and implementing related decisions. There is no other climbing area in the world like Indian Creek and this recreational value should be emphasized in any management initiative that is established for BENM and Indian Creek specifically.

Bears Ears National Monument Planning Process

The Climbing Organizations believe that the process leading to the original December 28, 2016 BENM designation (Proclamation 9558) adequately incorporated public outreach and coordination with relevant stakeholders, and conforms to the requirements of the Antiquities Act of 1906 for designating national monuments. The Climbing Organizations participated in public listening sessions and shared detailed climbing resource data in support of the process leading to the establishment of BENM. Accordingly, we believe that this management planning process is inconsistent with federal law and the proper original monument designation executed under Proclamation 9558 (and the management planning regime dictated therein). However, because this draft MMP has significant impact on the climbing environment and the many other important values of BENM, the Climbing Organizations provides the following comments to the management planning process for Indian Creek and Shash Jáa units of Bears Ears National Monument.

Bears Ears National Monument Management Plan

Many of the provisions in this draft MMP incorporated points raised by Access Fund's scoping comments from April 2018.⁵ Nonetheless, this MMP is inadequate in at least two fundamental respects: 1) it fails to address the excised portions of the BENM caused by President Trump's December 2017 Proclamation which is currently under litigation,⁶ and 2) this draft MMP does not benefit from a Monument Advisory Council (MAC) as required by both President Obama's Proclamation establishing BENM and President Trump's Proclamation that reduced the size of BENM. As such, the BLM developed this extensive Draft MMP prior to the creation of the required MAC which will be initiated only after all public comments are due and consultations completed for this MMP.⁷

This draft MMP has four alternatives: A (no action), B (the most restrictive/conservation focused alternative), C (adaptive management concept), and D (BLM's preferred alternative with most support for multiple uses). Generally, the Climbing Organizations support the adaptive management approach outlined in Alternative C, with modifications to replace a few provisions in Alternative C with specific direction from Alternatives B and D. The Climbing Organizations also recommend adding management direction for a few issues not addressed in the draft MMP, and support several actions common to all alternatives.

Climbing Organizations' Support for Actions Common to All Alternatives

The Climbing Organizations support several proposed actions common to all alternatives, such as the development of an activity-level cultural resources management plan that will provide site-specific, implementation-level direction to manage recreation and other uses to protect the integrity of cultural resources. As part of the effort to protect cultural resources the agencies will educate recreational users on methods to avoid and reduce impacts to sensitive cultural resources, and work with SRP and Special Use Permit (SUP) holders to train them in site monitoring techniques and conducting monitoring inspections.

Trails, Staging, Roads and Parking

For the Climbing Organizations, a high priority action common to all alternatives that we support in this MMP is planning for the development of “hiking paths and trails if consistent with maintaining [BENM] objects and values.” As part of the site-specific implementation-level travel planning, redundant hiking trails and social trails would be closed and reclaimed.

Recommendation: The Climbing Organizations urge the BLM to dedicate significant amount of planning resources and develop a comprehensive plan for the Indian Creek corridor as part of this travel plan to address existing and future climbing use patterns. This master plan is critical for the BLM to make informed decisions about current and future needs for the Indian Creek area and should document existing trails, foreseeable future trail needs, high-use staging areas at the base of popular climbing cliffs, parking areas, approach roads (including gate policies), and high-use trailheads. This plan could be identified as a “climbing area facilities plan” (perhaps a subset of the transportation plan) and address the many existing and needed access trails to dozens of walls throughout the popular Indian Creek corridor, consistent with the Visual Resource Management (VRM) standards supported below. The BLM should initiate this travel plan as soon as possible following the completion of the final MMP; the Climbing Organizations and our partners offer assistance with the research and development of this “facilities” plan, many details (mapping and otherwise) which we have already obtained.

Camping

The Climbing Organizations also support the proposed implementation-level camping plan developed for BENM, although we urge BLM planners to initiate this plan sooner than three years after the agencies complete the MMP. As part of this camping plan BLM should assess what dispersed camping areas should be retained in accordance with the VRM standards supported below.

Recommendation: The Climbing Organizations urge the BLM to also develop an extensive map/survey that identifies existing campgrounds, dispersed camping areas and authorized camping areas that have not yet been built (such as the Shay Mountain Campground). For Indian Creek, this camping analysis could be part of the “climbing area facilities plan” proposed above; such a mapping initiative could build on existing surveys and serve as a very useful tool when considering how to address camping needs that currently exist at Indian Creek as well as foreseeable future needs. As part of this process, the BLM should consider whether any additional campgrounds should be developed within the Indian Creek Unit, and if the agencies should decommission any existing campsites. Again, the Climbing Organizations offer our resources to develop this master camping survey that should be developed as part of a “climbing area facilities plan” since climbing use patterns for access trails and transportation are directly related to camping area needs (including waste disposal).

Support for a Modified Alternative C

The Climbing Organizations generally support Alternative C (with modifications), which emphasizes adaptive management to protect the long-term sustainability of BENM objects and

values, and provides for protections of key areas and resources while allowing for flexibility in the management of resource uses. Alternative C requires the monitoring of resource impacts and the implementation of more restrictive management actions if resource impacts exceed predefined thresholds, and provides flexibility while still providing enough direction to make the review of future site-specific actions more efficient and consistent. The Climbing Organizations believe Alternative C strikes an appropriate balance between the management direction found in Alternatives B and D; however, we recommend the use of a few provisions for select topics found in Alternatives B and D that we believe are more effective and practical.

Visual Resource Management

Recommendation: The Climbing Organizations support Alternative B’s direction for Visual Resource Management (VRM), which establishes the highest number of acres managed as VRM Class I of all the alternatives. VRM Class I “preserve[s] the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. This class level includes all areas where a decision has been made to maintain a natural landscape.” We support this strong standard because we believe it will protect the world-class viewshed at both the Indian Creek and Shash Jáa units of BENM.

Under Alternative B, the draft MMP would require a VRM I standard for most of the Indian Creek unit except for the valley bottoms (Indian Creek, Lavender Canyon, Cottonwood Wash) and the uplands along the southern and eastern boundaries of the Indian Creek unit, all which would be designated VRM II which, while not as protective as VRM I, nonetheless “retain[s] the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer.”

Any new VRM I or II management designations should “grandfather-in” existing climbing/recreational infrastructure and facilities such as campgrounds, parking areas, trails, staging areas and accommodate foreseeable climbing access trails and other necessary infrastructure. The Climbing Organizations also support the VRM provisions in Alternative B that protect more of the Shash Jáa viewshed, such as the Comb Wash area, as VRM I. We believe that necessary rock climbing facilities such as access trails, staging areas, fixed anchors, and parking areas can be managed consistent with these high VRM standards for the Indian Creek and Shash Jáa units.

Wilderness Study Areas and Lands with Wilderness Characteristics

The Climbing Organizations support protecting Wilderness Study Areas (WSA) and lands assessed as having wilderness character to retain their wilderness character. At Indian Creek the only WSA is located at the top of Bridger Jack Mesa (a location that attracts very few climbers) and thus the highly protective management requirements for this WSA will have little impact on recreation management.

Recommendation: The Climbing Organizations support the BLM developing specific climbing management provisions in this management plan that ensure the ability of climbers to place and maintain fixed anchors—necessary climbing tools to ascend and descend climbing routes. WSAs typically ban the placement of fixed anchors, but so long as the boundaries for these WSAs are located at the top of the cliffs at Bridger Jack Mesa (just above the high point of climbs) there is no management issue restricting the ability of climbers to maintain climbing fixed anchors. Irrespective of where the WSA boundary is located, all climbing anchors existing within BENM at the time of this MMP should be allowed to remain. BLM management of Lands with Wilderness Characteristics should likewise not preclude the placement of climbing anchors and other climbing infrastructure.

Cultural and Paleontological Resources

Recommendation: The Climbing Organizations support the provisions in Alternative C whereby all climbing routes, trails, and access points would remain open, but be monitored for impacts to cultural resources. If such impacts are observed, the agencies would work to educate users in “tread lightly”⁸ principles and encourage self-regulation to minimize impacts. Accordingly, under Alternatives C, the agencies will work more proactively with the climbing community to address and avoid conflicts and thus limit closures. The Climbing Organizations also support the direction in Alternative C, where the agencies may harden, reroute, or close trails as necessary to protect paleontological sites.

Wildlife/Raptor Nesting

The Climbing Organizations support flexible, science-based management prescriptions that protect nesting raptors. There exists a substantial literature base that outlines specific spatial and temporal restrictions that are proven to protect nesting raptors and minimize overarching closures. Successful raptor management utilizes varying buffer sizes depending on the raptor species, nest viewshed, raptor behavior patterns, geomorphology and terrain. Scientific research and site-specific monitoring should be carefully considered when developing management strategies that protect wildlife and minimize unnecessary recreation access restrictions. Under Alternative C, “the agencies would close climbing areas near “known and *historic* eyries and perennially active nests” during nesting season with buffers consistent with current BLM policy. In our experience with raptor management from across the country, supported by scientific research,⁹ it is problematic and unnecessary to restrict climbing activities at nesting areas because they may have *historically* been active.

Recommendation: The Climbing Organizations support the provisions in Alternative B where the agencies temporarily close areas to recreational activities with “*active* raptor nesting” according to the current best practices for developing temporospatial restrictions. Best practices include opening nesting areas once birds have fledged or have not established a nest site successfully. The agencies should also consider implementing a climber volunteer program to monitor for nesting. The non-profit Hawkwatch has worked effectively with the Salt Lake Climbers Alliance on a volunteer raptor-monitoring program to assess the effectiveness and timing of nesting. Other jurisdictions have successfully implemented similar programs. The U.S. Forest Service in Colorado at Boulder Canyon is one example, where a trained wildlife

biologist/climber volunteer (and a team of volunteers, with the Boulder Climbing Community,¹⁰ under his guidance) monitors raptor nesting activity, and closures are limited to actual nesting sites (vs. historical/potential sites).

“Hoodoos”

The language in the draft MMP addressing the management of rock climbing on arches and hoodoos is confusing and problematic, in part because “hoodoos” is undefined and potential restrictions could affect highly valued climbing objectives in the Shash Jáa SRMA such as Dream Speaker Spire¹¹ and other climbs along Comb Ridge¹² and in Arch Canyon.¹³ Similarly, while the Climbing Organizations and many climbers support the ban on climbing on arches at places like Arches National Park, similar restrictions on climbing arches are not typical on other federal public lands such as BLM and USFS.

It is unclear the significance the draft MMP assigns to “hoodoos,” but Proclamation 9558 notes the “area's stunning geology, from sharp pinnacles to broad mesas, labyrinthine canyons to solitary *hoodoos*...” Yet the MMP would only regulate climbing on arches and hoodoos (and not other significant geologic formations) within the BLM-managed portion of the Shash Jáa SRMA, not the neighboring U.S. Forest Service–managed portion of the Shash Jáa unit, nor the Indian Creek unit, of BENM. The Climbing Organizations agree that the outstanding geologic objects within BENM should be protected, but we 1) believe that climbing and the use of climbing gear does not damage the BENM geologic objects nor diminish the experience of other visitors, and 2) that all three action alternatives related to Shash Jáa hoodoos either ban climbing altogether or propose unrealistic restrictions¹⁴ on the use of hardware needed to safely ascend and descend BENM climbing objectives celebrated in Proclamation 9558 as “world-class.” It is clear that rock climbing is one of the ways that the public can appreciate and experience the protected objects of BENM, and this MMP should protect these experiences consistent with the protection identified BENM objects and values.

The Climbing Organizations believe that where climbing is an appropriate activity, climbing hardware and fixed anchors are necessary tools for climbing, and some level of fixed anchor use should be allowed wherever climbing is allowed.¹⁵ However, the appropriate level of fixed anchor use should be established on an area-by-area basis. Fixed anchor maintenance and replacement should be allowable for existing fixed anchors, and climbers should bear the responsibility, in accordance with land management regulations, for determining when and where to place and replace fixed anchors, and how to use these tools. Additionally, anywhere that fixed anchors will be or have been placed, there is a need to address long term fixed anchor maintenance, and replacing an anchor correctly and with the least impact is critical to sustaining climbing areas and protecting natural resources.¹⁶

Recommendation: The Climbing Organizations support the direction in Alternative C that allows climbing on “arches” and “hoodoos” in the Shash Jáa SRMA, but we support the use of climbing hardware necessary to safely climb and descend these outstanding climbing objectives. We support best practices that mitigate visual impacts, such as requiring any fixed anchor to be camouflaged, and we support additional adaptive management actions addressing locations

where visitor-use monitoring indicates that high levels of visitor encounters may lead to social conflicts.

Camping

Recommendation: As noted above, we support the proposed implementation-level camping plan developed after a required cultural resources management plan. The Climbing Organizations support the provisions in Alternative D whereby dispersed vehicle camping in the Shash Jáa Unit (including when allowed in RMZs) is allowed within 150 feet of designated routes (on each side of a centerline). We support the proposed action whereby if monitoring indicates impacts to BENM objects and values from dispersed vehicle camping in the Shash Jáa Unit, the agencies would close and restore impacted areas.

Group Size

Recommendation: The Climbing Organizations support proposed decisions for group size in Alternative C that are adaptable based on monitoring, and which would adjust access and visitor group size as needed. Alternative C would have a similar level of recreation restrictions as Alternative D, but provides more opportunities for monitoring, adaptive management necessary to protect Monument objects and values.

Pets

Recommendation: The Climbing Organizations support the provisions in Alternative D, whereby pets are allowed off-leash, so long as under voice control. However, pets would not be allowed in or at any alcoves, rock writing sites, or other archaeological sites. Pets must not harass or harm wildlife, visitors or other visitors' pets, and pets would not be allowed to swim in springs, potholes, or other natural water sources. Pet waste disposal requirements would be identical to human waste disposal requirements (pack it out where possible). If a significant amount of pet conflicts occur, then the Climbing Organizations support adapting this policy to that found under Alternative C whereby pets must be on leash at all times (in addition to the other restrictions outlined above).

Grazing

The Climbing Organizations support the provisions in Alternative C that makes Bridger Jack Mesa, Lavender Mesa and developed recreation sites unavailable for grazing (where practicable). We support trailing through the Bridger Jack Bench and other camping areas. However, we support the continued use of the Indian Creek grazing allotments by the Dugout Ranch and The Nature Conservancy's Canyonlands Research Center who conduct some of the most cutting-edge research investigating low-impact grazing practices for the Colorado Plateau. Dugout Ranch runs far fewer cattle than their permit authorizes, and seeks to protect important cultural and natural resources throughout the Indian Creek area.

Recommendation: The Climbing Organizations support the Dugout Ranch's continued operations at Indian Creek consistent with existing restrictions to protect cultural, natural and

riparian resources. This MMP should incentivize continued communication between the Dugout Ranch and climbing community to limit conflicts between the user groups and encourage better understanding of ranch operations.

Human and Other Waste

Recommendation: The Climbing Organizations support the waste policy found in Alternative B: all human waste must be packed out; all cans, trash, organic garbage, and burnable refuse including toilet paper must be carried out; liquid garbage may be discarded 200 feet from any water source; and dishwasher must be strained and discarded 200 feet from any camps, trails, and water sources. This MMP should consider how to best provide educational messaging/signage—possibly in partnership with the Climbing Organizations—surrounding best practices for human and other waste. This MMP should also consider planning for where and when new vault toilets may be needed to address human waste disposal needs.

* * *

The Climbing Organizations believe that Proclamation 9558 establishing Bears Ears National Monument should be considered the “law of the land,” and thus this planning process should be much larger in geographic scope. However, the management issues and challenges addressed in this comment letter should be incorporated into any final MMP for the Bears Ears National Monument. Please feel free to contact us to discuss this matter further. We look forward to working with the BLM and U.S. Forest Service to develop an appropriate, effective and durable plan for the world-class landscape and experiences found only at Bears Ears.

Best Regards,



Erik Murdock, PhD
Policy Director
Access Fund



Julia Geisler
Executive Director
Salt Lake Climbers Alliance



Rachel Nelson
President
Friends of Indian Creek



Jason Keith
Senior Policy Advisor
Access Fund

¹ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

² See <https://obamawhitehouse.archives.gov/the-press-office/2016/12/28/proclamation-establishment-bears-ears-national-monument>.

³ See <https://www.mountainproject.com/area/105716763/indian-creek>

⁴ See <https://www.gpo.gov/fdsys/pkg/DCPD-201600875/pdf/DCPD-201600875.pdf>.

⁵ See https://www.accessfund.org/uploads/AccessFund_Comments_BENM-Plan-Scoping_20180411.pdf.

⁶ On December 4, 2017, President Donald Trump signed Proclamation 9681 modifying in size and management the BENM designated by Proclamation 9558. Thereby, Proclamation 9681 excluded approximately 1.15 million acres of land from BENM, many acres that contain important climbing resources that are not covered by this management planning process. The following climbing areas were included in Proclamation 9558 establishing Bears Ears National Monument, but were excluded from the monument by Proclamation 9681:

- Valley of the Gods/Mexican Hat Rock Climbing - <https://www.mountainproject.com/area/105716760/valley-of-the-godsmexican-hat>
- Bluff Area - <https://www.mountainproject.com/area/109346500/bluff>
- Jacob's Chair - <https://www.mountainproject.com/forum/topic/107214009/jacobs-chair-utah>
- Hammond Canyon - <https://www.mountainproject.com/area/107780314/hammond-canyon>
- Cliffs of Insanity - <https://www.mountainproject.com/area/105790333/cliffs-of-insanity>
- The Wall - <https://www.mountainproject.com/area/105854200/the-wall>
- Harts Draw - <https://www.mountainproject.com/area/107483982/harts-draw>
- Lockhart Basin - <https://www.mountainproject.com/area/105716817/lockhart-basin>

⁷ Other than specifically delineated issues related to transportation, grazing, and vegetation management, Proclamation 9681 explicitly retains all other provisions from the original Proclamation 9558 by stating “[n]othing in this proclamation shall change the management of the areas designated and reserved by Proclamation 9558 that remain part of the monument in accordance with the terms of this proclamation.” See <https://www.whitehouse.gov/presidential-actions/presidential-proclamation-modifying-bears-ears-national-monument/>.

⁸ BENM planners should note that “Tread Lightly” is a term that generally concerns best practices for responsible motorized recreation. While the Climbing Organizations support this approach, “Leave No Trace” practices that concern non-motorized recreation best practices may be a better term for this context.

⁹ See <http://www.climbingmanagement.org/issues/wildlife>.

¹⁰ See <https://www.boulderclimbers.org>.

¹¹ See <https://www.mountainproject.com/area/105717030/dreamspeaker>.

¹² See <https://www.mountainproject.com/area/106286326/comb-ridge>.

¹³ See <https://www.mountainproject.com/area/105716842/arch-canyon>.

¹⁴ For an explanation of how the climbing system works and why climbers need the use of climbing gear and sometimes permanent hardware to climb and descend, see *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* found at https://www.accessfund.org/uploads/ClimbingManagementGuide_AccessFund.pdf. Fixed anchors reduce climbers' impact while improving safety, particularly when compared against alternatives (e.g., webbing/slings). Thus, allowing the judicious use of climbing hardware and activities to maintain the hardware—such as power drills—are beneficial to both the resource and users.

¹⁵ https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf.

¹⁶ For an extensive online resource outlining best practices for fixed anchor maintenance, see <https://www.accessfund.org/learn/for-advocates/managing-fixed-anchors>.