



Protect America's Climbing

December 14, 2015

Jefferson County Open Space
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RE: Jefferson County Open Space DRAFT Climbing Management Guidelines and Proposed Raptor Management

Jefferson County Open Space:

The Access Fund welcomes this opportunity to comment on Jefferson County Open Space's Draft Climbing Management Guidelines. Jefferson County (JeffCo) offers a range of popular rock climbing opportunities, including Clear Creek Canyon, North Table Mountain, Windy Saddle Park, Mt. Lindo, and Cathedral Spires. The Access Fund values the relationship being developed with JeffCo and the efforts being made to manage climbing resources within the county. Access Fund offers these comments and recommendations with the intention of improving the Climbing Management Guidelines by presenting the needs, use patterns and concerns of the greater climbing community and proposing effective and appropriate management policies that will assist JeffCo planners.

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 millions of 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 100 affiliates. The Access Fund provides climbing management expertise, stewardship, policy and educational outreach. For more see www.accessfund.org.

Overview

JeffCo boasts several nationally significant rock climbs such as the multi-pitch traditional crack climbing found at Cathedral Spires where historic and classic routes such as Cynical Pinnacle, Sunshine Wall, The Bishop and The Dome were established in the 1960s and 1970s.¹ Other important areas in JeffCo are very popular front country climbing crags such as those found in Clear Creek Canyon and at North Table Mountain.²

Earlier this year JeffCo released [Draft Climbing Management Guidelines](#) (DRAFT CMG) as well as a

¹ See <http://www.mountainproject.com/v/cynical-pinnacle/105797908>.

² See <http://www.mountainproject.com/v/golden/105800295>.

new proposed raptor management strategy for Clear Creek Canyon for public comment. The DRAFT CMGs add significant new regulations to the [existing CMG](#). The focus of the additional regulations is fixed anchor management. JeffCo has cited concerns about several issues related to fixed anchors including, safety, erosion, wildlife, inventory and monitoring.³ To address the aforementioned concerns, the DRAFT CMG proposes a fixed anchor permit process. The new permit process necessitates the submission of an application for any activity associated with changes to fixed anchors: placing new fixed anchors, replacing fixed anchors, removing fixed anchors, and adding “temporary synthetic fixed draws and slings.” In addition, the DRAFT CMG proposes a new process for evaluating fixed anchor applications.⁴

Following our analysis of the DRAFT CMG and conducting local climber outreach, Access Fund would like to comment on three major categories: 1) categories/activities that necessitate fixed anchor permits, 2) the fixed anchor permit review and permitting process, and 3) proposed raptor closures. The Access Fund believes the DRAFT CMG can be improved in the following ways: First, because bolts need to be replaced when unsafe, simple fixed anchor maintenance and replacement should be allowed for existing fixed anchors without an obstructive or extensive permitting process. Also, JeffCo should limit permit requirements for new fixed anchor placements to undeveloped crags and/or specific areas with sensitive natural resources. Finally, Raptor management strategies should include ongoing monitoring to understand the behavior patterns of specific nesting pairs to limit closure time-periods in areas.

Comments

I. Fixed Anchors Activities

Fixed anchors play an essential and integral role in climbing. Our position⁵ on fixed anchors directs the following analysis and recommendations for activities associated with fixed anchors

³ Jefferson County Open Space Climbing Management-Fixed Hardware FAQs, 2015.

⁴ Climbing Management Guidelines-Management Strategies for Rock Climbing and Slack Lining, Jefferson County Open Space, Colorado, October 2015.

⁵ Our position on fixed anchor management is:

1. Fixed anchor maintenance and replacement shall be allowable for existing fixed anchors.
2. Climbers, not the government, 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.
3. Public input is critically important for the management of fixed anchors. Climbers need to have a voice in managing key elements of the climbing safety system.
4. Administrative actions regarding fixed anchors should be well substantiated and noticed to the public. Decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment. Fixed anchor management alternatives should be evaluated before any decisions are made to restrict the use of fixed anchors. All administrative changes to the condition of fixed anchors (e.g., removal) should be well-publicized to help mitigate potential negative impacts to climber safety.

Visit [here](#) for Access Fund’s entire fixed anchor position.

addressed in the DRAFT CMG. The DRAFT CMG proposes permits be required for:

- Installing fixed hardware (bolts, anchors, etc.)
- Replacing or removing fixed hardware
- Temporary synthetic fixed draws and slings for “project routes” where leaving temporary gear is required for safety may be permitted to be left for a maximum of 30 days ⁶

We recommend changes to the following climbing activities that require permits, as currently listed in the DRAFT CMG.

New fixed hardware: The need for regulation of climbing route development is dependent on several factors including environment, level of use, existing impacts, land management, climbing resource extent, liability, historic uses, and local climbing community. Regulation of fixed anchors should be based on JeffCo’s established management strategies, which “assure that JCOS works with the climbing community to limit potential adverse effects of rock climbing activities.”⁷ Refer to the section below on Fixed Anchor Permit Review and permitting process for our comments on new fixed hardware management.

Replacing fixed anchors: Access Fund advocates for swift, unobstructed fixed anchor maintenance. The DRAFT CMG proposes that fixed anchor replacement permits be submitted directly to JeffCo for review. This process significantly delays fixed anchor maintenance, an activity that often needs to be conducted in the moment. JeffCo should manage replacing fixed anchors based on their management objective to “manage the use of fixed-protection so as not to adversely affect the quality of the rock resource, the safety of the climbing community, the recreational experience of future climbers.”⁸ JeffCo is interested in creating an on-going record and inventory of fixed anchors placed and replaced,⁹ and although the proposed permitting process could achieve that goal, it also impedes important fixed anchor maintenance. Access Fund proposes a self-reporting process for fixed anchor maintenance activities (e.g., through www.mountainproject.com, a local climbing organization or even JeffCo) that would not restrict fixed anchor replacement opportunities by imposing an unnecessary permit process. To ensure proper hardware and replacement technique is being implemented, pre-approved individuals could be authorized programmatically to replace hardware without JeffCo needing to administer individual permits but with the understanding that hardware replaced will be reported back to the county.

Removing fixed anchors: Access Fund believes that climbers should bear the responsibility for deciding whether to remove fixed anchors. However, if JeffCo determines that a fixed anchor needs to be removed, the decision should be well substantiated and noticed to the public. JeffCo’s decisions to remove fixed anchors should be based on JeffCo’s management standards;

⁶ Climbing Management Guidelines-Management Strategies for Rock Climbing and Slack Lining, Jefferson County Open Space, Colorado, October 2015.

⁷ Climbing Management Guidelines <http://jeffco.us/open-space/activities/climbing/management-guide/>.

⁸ Climbing Management Guidelines <http://jeffco.us/open-space/activities/climbing/management-guide/>.

⁹ Jefferson County Open Space Climbing Management-Fixed Hardware FAQs, 2015.

- Practice responsible management of our human, natural, historical, park and financial resources.
- Provide quality experiences for our customers, visitors, participants, staff and volunteers.
- Exchange information and foster collaboration to produce the best possible results.¹⁰

Fixed anchor management alternatives should be evaluated before any decisions are made to remove fixed anchors. All administrative changes to the condition of fixed anchors (e.g., removal) should be well-publicized to help mitigate potential negative impacts to climber safety.

Fixed Draws: We believe that the use of fixed draws should not necessitate the acquisition of a permit; however, recommendations could be developed, with input from the climbing community, to establish standards for fixed draw materials and the length of time fixed draws should hang on a route. The primary concern associated with non-metal fixed draws is the safety and reliability of the draw. We recommend moving fixed draws from a permitted activity to the safety tips section in the CMGs. Judgement on the safety of fixed draws should be left to the judgement of the climber.

II. Fixed Hardware Guidelines

The DRAFT CMP has a section titled *Fixed Hardware Guidelines*. We suggest changes to two of the proposed guidelines in the DRAFT CMG.

Permanent Synthetic Fixed Draws and Slings: Currently the DRAFT CMG states that “permanent synthetic fixed draws and slings are prohibited.”¹¹ We suggest rewording this to say, “permanent non-metal draws for protection on a route are not permitted.” Webbing slings are sometimes used to rappel off traditional climbing routes where no bolts have been placed. The condition and use of this webbing should be left to the judgement of the climber.

Lowering on Fixed Gear: Currently the DRAFT CMG states, “rappel from fixed anchors in place of being lowered after cleaning a route. Lowering on fixed hardware includes unnecessary wear and tear, requiring more frequent replacement of gear.”¹² We suggest rewording this as a suggestion not a regulation, and moving it to the safety tips section of the DRAFT CMG.

III. Fixed Anchor Permit Review and permitting process

JeffCo’s DRAFT CMG outlines a fixed anchor permit review process that involves five steps: 1) application submission, 2) Fixed Hardware Review Committee (FHRC - 5 JeffCo elected volunteer citizens) review, 3) JeffCo Natural Resources and Trails assessment, 4) JeffCo staff climbing committee review, and 5) notification of determination to applicant.¹³ The activities that necessitate permitting are discussed above in *Fixed Anchors Activities* section of this comment

¹⁰About Jefferson County Open Space <http://jeffco.us/open-space/about/>.

¹¹ Climbing Management Guidelines-Management Strategies for Rock Climbing and Slack Lining, Jefferson County Open Space, Colorado, October 2015.

¹² Climbing Management Guidelines-Management Strategies for Rock Climbing and Slack Lining, Jefferson County Open Space, Colorado, October 2015.

¹³ Fixed Hardware Review Committee, Code of Conduct, Jefferson County Open Space, Colorado, October 2015.

letter. This section addresses the fixed anchor review committee framework.

Access Fund believes that a FHRC comprised of members in the local climbing community should provide the initial review of fixed anchor permit applications. JeffCo would conduct a secondary review and have final say on permit approvals. In this way, the climbing community could assess whether a new anchor or route is appropriate prior to JeffCo receiving the application. This process would reduce the administrative burden on JeffCo while bringing an important degree of self-regulation and oversight among the climbing community.

Fortunately, the JeffCo area climbing community is well-developed and includes leaders who are willing to organize their community. We propose a meaningful collaboration between JeffCo and the local climbing community that is, in part, geared toward the development of a FHRC that is nominated and chosen by the local climbing community. A memorandum of understanding should be executed to commit JeffCo and the to-be-determined local climbing community review entity to an extended relationship. The Access Fund currently holds memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest service to help define how climbing will be managed on federal land.¹⁴

We suggest a pilot FHRC that reviews permits and hardware only for specific geographic areas within the county. This pilot program will help fulfill the DRAFT CMGs which state that “JCOS staff and climber representatives will work together to make recommendations to the Park Management Planning Teams to formulate site-specific climbing management plans for each park that has climbing resources.”¹⁵ Areas designated for FHRC review could include undeveloped areas within Clear Creek Canyon and other areas in the county with sensitive resource concerns. We have found that programs applied to multiple climbing areas, in this case an entire county, do not result in quality management of the resource. By focusing on the heaviest used area first you can evaluate the effectiveness of the proposed new process, make necessary changes as the program evolves and limit burden to the stakeholders. The Access Fund supports tailored management of individual climbing areas; we do not feel that the current proposed program can be effectively implemented county wide.

To address the specific needs and concerns of JeffCo, a combination of two permitting types could be considered, using a zone management strategy for developed and undeveloped areas. We suggest individual route permits as necessary; perhaps, for example, for new, undeveloped crags in Clear Creek Canyon. This would allow JeffCo to conduct an initial assessment of trail needs and other potential resource impacts.

In areas already developed for climbing, we propose that individual route permits not be required. Instead route developers would complete a bolt placement certification process that ensures first ascensionists are educated on JeffCo’s regulations. An example of programmatic permitting of individuals being implemented can be found at Castle Rocks State Park in Idaho.¹⁶

¹⁴ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

¹⁵ Climbing Management Guidelines <http://jeffco.us/open-space/activities/climbing/management-guide/>.

¹⁶ See <http://www.nps.gov/ciro/learn/management/upload/Castle-Rocks-Climbing-Management-Plan-2003.pdf>.

Developers commit to self reporting of new route development for inventory purposes after receiving an orientation certificate. Additional options for self reporting programs include inventories managed by www.mountainproject.com, a local climbing organization or JeffCo.

IV. Raptor Management Strategy

JeffCo has developed a proposed raptor management strategy for 2016 in Clear Creek Canyon based on a combination of ¼ mile radius buffers and portions of the view shed that fall within a ½ mile radius of the active nest sites (Figure 1). If the Clear Creek eagles continue to nest in the active nests the areas will remain closed from February 1 through July 31. If the eagles choose different nesting sites, closures will be adjusted accordingly.

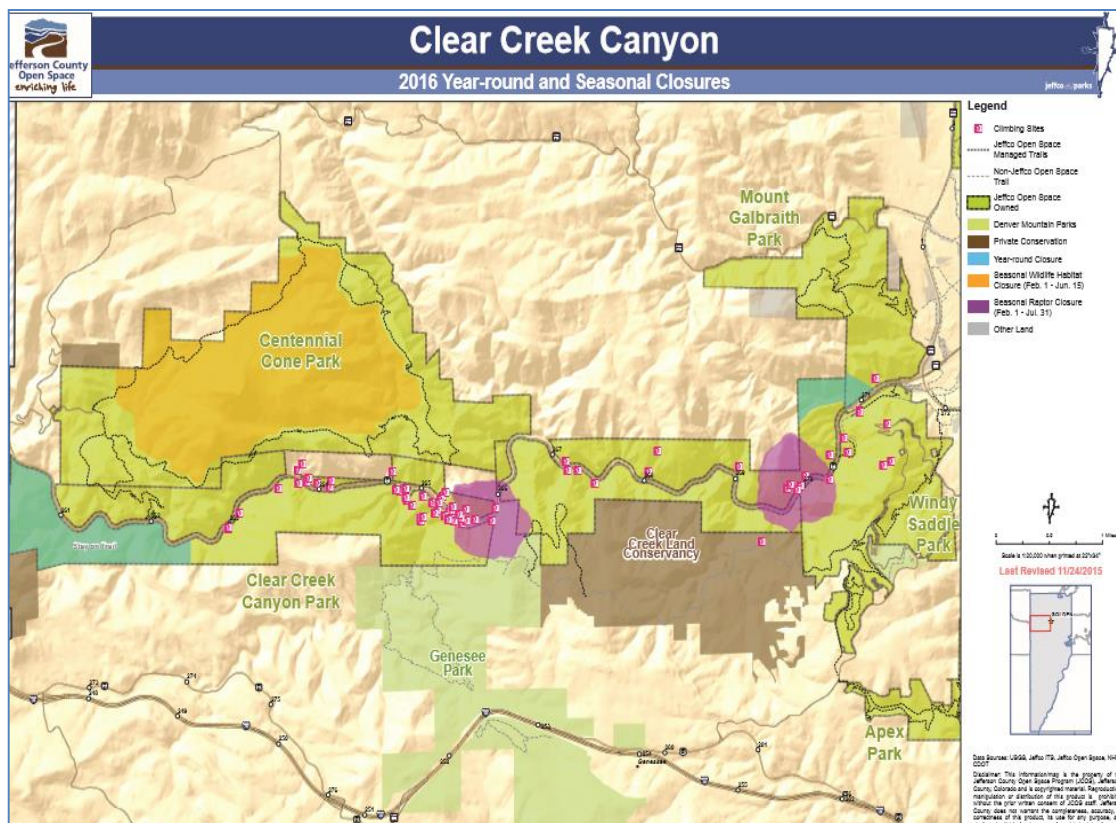


Figure 1. Second draft of Clear Creek Canyon 2016 raptor closures¹⁷

Access Fund advocates for raptor management strategies that protect raptors through science-based and well-substantiated mitigation that limits closure time-periods and areas to places where human activity could impair the success of breeding raptors. The proposed raptor strategy and viewshed analysis is a good start to managing raptor closures. We encourage ongoing monitoring and additional line-of-sight surveys be conducted in proposed closure areas to eliminate unnecessary access restrictions while protecting nesting raptors.

¹⁷ Jefferson County Open Space website-Seasonal Closures in Clear Creek Canyon <http://jeffco.us/open-space/activities/climbing/>- December, 2015.

Access Fund encourages nest monitoring that supports flexible and effective closures. Nest sites that are not used for breeding (considering that eagles may delay nesting due to unusual climate conditions or other factors), unsuccessful breeding pairs, and early (or late) fledging. Several studies indicate that individual pairs of Golden eagles react differently to the same external pressures—some are more sensitive than others. The best raptor management strategies are based on frequent monitoring to understand the behavior patterns of specific pairs. An excellent example of managing raptor closures in popular climbing areas is in the nearby Boulder Canyon. The USFS Boulder Ranger District, has worked with the local climbing organization Boulder Climbing Community (BCC) to actively monitor raptor pairs and limit closures of crags.

Other examples of progressive resource managers operating flexible restriction systems to allow for flexible closure dates include; Eldorado Canyon State Park, CO; Pinnacles National Park, CA; Devils Tower National Monument, WY; and the White Mountains in New Hampshire. For all these sites, if the raptors fail to nest in a closed area, arrangements are in place for the restriction to be lifted mid-season (usually mid-May) and for public information to be provided.

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The Access Fund appreciates this opportunity to comment on Jefferson County Open Space's DRAFT CMP. We presented comments and changes to three major categories of concern: 1) the activities that necessitate fixed anchor permits, 2) the fixed anchor permit review and permitting process, and 3) proposed raptor closures. We believe that swift fixed anchor maintenance and replacement must be allowed for existing fixed anchors, new anchor permits should be required only for undeveloped crags and specific areas with sensitive natural resources, and raptor management strategies should include ongoing monitoring to understand the behavior patterns of specific to limit closure time-periods in areas.

We acknowledge the time and effort JeffCo has put into developing this DRAFT CMG and proposed raptor strategies for Clear Creek Canyon. Our comments and suggestions are aimed to help develop sustainable climbing management guidelines that include the tailored management of climbing resources throughout the county and provide a safe climbing experience while limiting the burden to the stakeholder. We look forward to continuing to build a working relationship with JeffCo, and value your careful consideration of our comments on the DRAFT CMG and proposed raptor management strategy for Clear Creek Canyon.

For more information about the Access Fund, visit www.accessfund.org.



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