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### **Southern Nevada Climbers Coalition and Access Fund Comments on Calico Basin Recreation Area Management Plan and Draft Environmental Assessment**

The Southern Nevada Climbers Coalition (SNCC) and Access Fund appreciate the opportunity to offer these comments on the Recreation Area Management Plan (RAMP) and draft environmental assessment (EA) for Calico Basin. Calico Basin is home to incredible environmental and recreational resources, such as the iconic and highly accessible Kraft Boulders, as well as numerous sport climbing areas visited by climbers from across the world. We are eager to work with the BLM to find the best possible management strategies to ensure the long-term sustainability of climbing in the area.

#### **About the SNCC**

The SNCC is a grassroots affiliate of the [Access Fund](#). We advocate for rock climbers in Southern Nevada by promoting responsible stewardship of local resources and cultivating greater community awareness and involvement.

The SNCC provides an avenue for constructive dialogue between climbers and local land managers, as well as a resource for local and visiting climbers seeking information about the world-class climbing destinations in Southern Nevada. For more information about the SNCC, visit [www.southernnevadaclimberscoalition.org](http://www.southernnevadaclimberscoalition.org).

#### **About Access Fund**

The Access Fund is a national advocacy organization and accredited land trust whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. The Access

Fund and BLM memorandum of understanding<sup>1</sup> outlines an agreement to collaborate on climbing management, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## **Comments**

Devising a RAMP for Calico Basin is no easy task, and SNCC and Access Fund appreciate the efforts the BLM has made to create management strategies that seek to satisfy a truly diverse array of needs and challenges. We recognize the meteoric rise in popularity of Calico Basin over the last few years, with annual visitation hitting nearly 750,000 users in 2020, a 340% increase since 2003.<sup>2</sup> Solving the social, cultural, and natural resource impacts that inevitably occur with such a growth in use can require tactics that are difficult to implement. SNCC and Access Fund have several suggestions for adjustments to the draft RAMP that we request the BLM consider for the long term accessibility and sustainability of Calico Basin.

### **Adaptive Management**

We strongly support the BLM's commitment to adaptive management as a guiding philosophy in the Calico Basin RAMP. In the spirit of adaptive management, we believe the BLM should offer additional alternatives within the EA that consider less restrictive changes to management strategies. The current draft RAMP only proposes implementing major changes such as gating roads, establishing day-use hours, requiring online reservations, and dramatically increasing fees. Following the principles of adaptive management, we suggest that the BLM consider a wider range of management approaches in this draft RAMP, and only resort to higher degrees of regulation and restriction as informed by monitoring. The following sections detail our recommendations for such approaches.

### **Trails**

Trails are a critical part of climbing access, and SNCC and Access Fund appreciate the BLM's recognition of this. We are more than willing to assist with any inventorying and stewardship work necessary to improve trails, and support the RAMP's proposed efforts to identify and integrate existing climbing access routes into the BLM trail system, as well as close redundant or overly impactful social trails. In October 2017 Access Fund submitted a Red Rock Canyon National Conservation Area Climbing Access Stabilization Proposal. This proposal was developed in collaboration with BLM staff. At the time the project was developed BLM staff decided not to include Calico Basin in our surveys and proposal. We are willing to work with the BLM staff to conduct a similar survey, report, and proposal for Calico Basin. The 2017 proposal is still pending approval and implementation.

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<sup>1</sup> <https://d1w9vyym276tvm.cloudfront.net/assets/AccessFund-BLM-MOU-2015.pdf?mtime=20200711222339&focal=none>

<sup>2</sup> <https://www.virtualpublicmeeting.com/calicobasinramp-welcomeprojectintro>

Climbing areas in Calico Basin and beyond are often accessed by social trails. There is a need to evaluate the impact of social trails on the environment, and in some cases close them to prevent impact, however consideration should be given to the closure of social trails that lead to a loss of climbing access. The BLM should partner with climbing groups to find solutions to this issue, whether that means bringing certain social trails into the official trail system or finding alternate access routes that mitigate impacts to sensitive areas.

One point of concern SNCC and Access Fund have in relation to trails is Brownstone Canyon. Though the Brownstone Canyon trailhead is mentioned multiple times in the RAMP, the document does not emphasize how potential enhancements in the plan area might affect Brownstone's abundant cultural resources, nor is there clarity on the future of its access. Due to expanding housing development on Calico Basin's eastern side, access routes to the Brownstone Canyon trailhead are in flux. There must be clarity on the intended legal access to the area, whether that means cross-country travel within Calico Basin or access through the eastern housing development. With Brownstone Canyon included in the northern boundary of this RAMP, the plan must both prioritize the cultural resources of Brownstone, and outline decisions for the future of the ongoing access to this designated trailhead.

### **Fees and Equity Considerations**

SNCC and Access Fund are glad that the BLM has taken environmental justice into consideration as part of the RAMP. At the same time, we feel that the RAMP brings up clear equity issues without offering solutions to them. The RAMP explicitly states that increasing the day use fee to \$20 "could cause a disproportionate impact on lower-income populations," and that a full 17% of all visitors to the RRCNCA are from a disadvantaged group.<sup>3</sup> Despite this, the BLM also says that it does not expect the increase in fee to be a deterrent to visitation to the area, and that spending will essentially be unimpacted.<sup>4</sup> It is unclear how the BLM has come to this conclusion, but it seems unlikely that the nearly one in five RRCNCA users the BLM classifies as from disadvantaged backgrounds will not change their use patterns in the face of such a fee increase.

SNCC and AF understand that fees can be necessary to protect the lands we all love, and that fee increases are often needed in the long term. With that said, if the BLM wishes to fully consider the justice, equity, diversity, and inclusion ramifications of the fee increases proposed, the BLM must also have a plan to deal with the negative impacts of the increase on marginalized communities within the RAMP. This does not currently exist.

Furthermore, the draft RAMP proposes an online reservation system to acquire a permit to access Calico Basin. While this is a fairly standard practice across federal land agencies, it can create a barrier for individuals who do not have access to a computer, internet, and a credit card. We suggest the BLM hold a certain number of permits available for the day of purchase

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<sup>3</sup>

[https://eplanning.blm.gov/public\\_projects/2016281/200499801/20049485/250055668/Calico%20Basin%20Draft%20RAMP%20and%20EA\\_508\\_1.pdf](https://eplanning.blm.gov/public_projects/2016281/200499801/20049485/250055668/Calico%20Basin%20Draft%20RAMP%20and%20EA_508_1.pdf) (p.4-41).

<sup>4</sup> Ibid.

with cash at the entrance (i.e. a walk-up option). This would provide all sectors of the population fair access to Calico Basin.

We urge the BLM to work with the local community to advance inclusive and equitable access to Calico Basin and Red Rock Canyon at large. By reaching out to, and learning from, the 17% of disadvantaged users identified by the BLM's own research, the BLM can find solutions to the potential equity pitfalls identified in the RAMP. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ+ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area located in a densely populated and diverse community, Red Rock Canyon should be accessible to people from a true diversity of backgrounds - a principle SNCC, AF, and the BLM all agree upon. Access Fund has staff dedicated to JEDI issues, and is more than willing to offer our time and resources to assist the BLM in applying JEDI principles to their lands in southern Nevada and beyond.

On the technical side, fee collection for Kraft Mountain cannot be implemented until the 2018 Business Plan is amended to list the area as authorized for fee collection. We recommend a robust analysis that considers whether fee collection is equitable and the minimum administrative tool for protecting resources and improving visitor experience.

A final point on equity concerns the needs of Las Vegas and Clark County locals. Though Calico Basin is federal public land, and therefore managed for the good of all Americans, many of the changes proposed by the BLM will disproportionately impact locals, many of whom moved to the area and built their ways of life around access to Red Rock and Calico Basin. Limiting hours to day use only, for example, is especially harmful to locals, whose use is predominantly in the uncrowded after work hours - see the below section for more details on this issue. Similarly, requiring reservations year round, instead of just during peak times, places an extra logistical and financial burden on local residents, many of whom visit the RRCNCA over a hundred days per year, often during periods of the year and/or week when overcrowding is a nonissue. Though the BLM cannot specifically preference locals through policy, we strongly believe they should take into account the ways that proposed changes can disproportionately impact those who visit Red Rocks the most - people who also often devote significant personal time to stewardship and education work. Where such impacts to local use patterns can be mitigated, they should be.

### **Reservations and Mitigating Overcrowding**

The need for managing crowds during certain times of the year and day at Calico Basin and the RRCNCA more broadly cannot be disputed. We believe the current iteration of the reservation system proposed for Calico Basin, however, is not the ideal method of reducing overcrowding. The BLM proposes limiting user numbers based solely on the number of parking spots currently available. If limited entry day-use permits and quotas are implemented, they must be carefully tailored to reflect scientifically collected visitor use data and only require limited entry day-use

permits be implemented during times proven by visitor use data to exceed carrying capacity beyond just parking infrastructure. Some reasonable level of Adaptive Management would allow the BLM to monitor use, allowing either daily quotas to be lowered or raised. If the BLM is only basing carrying capacity on the number of parking spots available they should explore the following possibilities:

- Only require reservations during critical peak periods - i.e. weekends, holidays, and other high-traffic times such as the weekdays around Thanksgiving and Christmas.
- Enforce existing parking regulations - far more people are using Calico Basin than there are actual delineated parking spots available, mostly by leaving their vehicles in unsanctioned locations. Simply enforcing the parking limits currently in place would reduce use levels.
- Instead of a gate, the BLM could install a self-serve kiosk and require users to pay a parking fee to park at the various parking areas in Calico Basin. Fees collected should be used towards visitor education, conservation, and recreational infrastructure.
- If the BLM must move forward with the proposed gate, they should allow for early entry/late exit, similar to the Scenic Loop, along with allowances for pedestrians to enter.
- Explore options for additional legal parking outside the Calico Basin that would allow climbers and other recreational users to access Calico Basin by foot.
- Increase the presence of rangers, both to enforce regulations designed to safeguard cultural and natural resources and also to better educate users. Both actions would reduce user impact on average, allowing more people to responsibly experience the area.
- Partner with SNCC and Access Fund to stabilize and harden existing staging areas, climbing access trails, and infrastructure, and close and reclaim redundant social trails. These improvements would protect natural and cultural resources.

Furthermore, SNCC and AF strongly feel that limiting the access hours to Calico Basin is unnecessary. Overcrowding in the afterdark hours is not an issue at Calico Basin, and many locals treasure the area as a post-work spot to hike, climb, and generally find time to be out in nature. Especially in the summer months, being able to visit Calico Basin during the cool of night or very early in the morning is an experience critical to the well-being of the local residents, and given the lack of crowding during those times, limiting access to the hours proposed in the RAMP (which are universally too early to allow afterwork excursions in the winter, and nighttime use in the summer) is not required for resource protection.

### **Resource Protection and Recreation Ecology Principles**

Climbers in general are strong defenders of cultural and natural resources. No climber wants to have the experience of nature degraded or compromised for others, and climber compliance rates with highly restrictive measures to protect wildlife, such as raptor closures, are remarkably high. Nonetheless, it is a guiding principle of both land managers and SNCC and AF that the least burdensome regulations necessary for the protection of the resource should be used at all times. Though a reservation system may well be necessary during particularly crowded times of

the year, there are a number of other methods for reducing user impact that do not require limiting access.

For example - many long time users report only rarely seeing a ranger out at Calico Basin. We understand that it takes time to fill these roles, and SNCC, Access Fund, and the local Red Rock climbing community have a huge appreciation for the dedication, passion, and hard work of the BLM ranger team at RRCNCA. To that end, we are thrilled that the BLM has increased the size of its ranger team from two to 13 people. We applaud the BLM for making this investment and believe this approach will lead to strong outcomes for ensuring sustainability in Calico Basin. We are also glad that the climbing community can begin coming to events like the Red Rock Rehab again, as such events are a great opportunity for our community to get educated, meet the rangers, and give climbers a window into how deeply the ranger team cares for the area. These interactions are necessary both to build and educate the greater community of stewards and build relationships between users and BLM staff.

As such, before focusing on increased restrictions to access, we urge the BLM to keep building on the steps they have already taken to create a more rigorous ranger presence in the area, both for education and enforcement, in order to mitigate user impact. A stronger ranger presence will reduce parking violations (thereby reducing crowding), increase compliance with critical regulations to safeguard the landscape, and provide opportunities for the long term education of users.

This approach is in line with broader recreation ecology principles, which affirm that simply limiting the number of users does not necessarily better protect or restore ecological integrity to a resource. Recreation carrying capacity concepts have evolved over several decades from a focus on fixed visitation limits to comprehensive decision making frameworks focused on sustaining high-quality recreational opportunities.<sup>5</sup>

Recreation ecology studies looking at the amount of visitor use related to resource impacts consistently find that use and impact are strongly related only at initial and low levels of visitation, with weak correlations at higher use levels.<sup>6</sup> High levels of resource impacts often occur on established and heavily used trails and recreation sites: reducing use to improve resource condition is generally an ineffective practice. Because of the general asymptotic use/impact relationship and the influence of many other factors, reducing use on a heavily used trail is unlikely to improve trail and surrounding resource conditions.<sup>7</sup> An increasing number of recreation ecology studies describe the efficacy of alternative management strategies, including the design, location, and maintenance of sustainable trails and recreation sites.<sup>8</sup> For areas with high visitation, a containment, concentration, and education strategy is recommended and has been effectively applied.<sup>9</sup> Many visitor impacts are directly related to human behavior by

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<sup>5</sup> Marion, J. 2016. A review and synthesis of recreation ecology research supporting carrying capacity and visitor use management decisionmaking. *Journal of Forestry*. <http://dx.doi.org/10.5849/jof.15-062>.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> Leung, Y.-F., AND J.L. Marion . 1999. Spatial strategies for managing visitor impacts in national parks. *J. Park Rec. Admin.* 17(4):20–38.

uneducated visitors who value the places they visit, yet lack the knowledge on proper outdoor ethics and behavior.<sup>10</sup>

We understand that funding and staffing to facilitate such infrastructure and education initiatives is a major struggle for federal land managers. The SNCC and Access Fund are more than willing to assist the BLM as needed with devising creative solutions to this obstacle, from fundraising to replicating volunteer and/or Access Fund-supported climber-steward programs. Such programs are already in place at other popular climbing areas across the country - Access Fund recently partnered with the Utah BLM to create a new climber-steward program for the Indian Creek area outside of Moab, for example.<sup>11</sup> These and similar programs have the potential to create a major positive impact for minimal cost, and Access Fund is ready to assist the BLM in creating one for the RRCNCA.

### **Collaboration and the Climbing Management Plan**

SNCC and Access Fund value our partnership with the BLM and wish to keep our relationship healthy and collaborative. The management challenges we all face are serious, and any solutions decided upon will only be effective with the buy-in of the community. SNCC and Access Fund are firmly committed to being good faith partners to the BLM, and we know the BLM feels similarly. Satisfying this commitment means all parties actively participating in the scheduled monthly meetings between SNCC and the BLM, consistent communication ahead of major decisions or campaigns from all organizations involved, and transparency in the development of recreation policy, especially around climbing.

To that end, SNCC and Access Fund are eager to assist the BLM as they devise their new climbing management plan (CMP) for the RRCNCA. As the user group that is singularly impacted by this plan, we wish to collaborate with the BLM as early and often as possible on creating the best possible management strategies for both the sustainability of the NCA and climbing access. Please keep both SNCC and Access Fund informed as the CMP process progresses.

### **Access Fund and SNCC Assistance**

The Las Vegas climbing community and Access Fund are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the BLM may require to provide for the outstanding opportunities found in Calico Basin. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain<sup>12, 13</sup> climbing areas throughout the United States by assessing climbing area

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<sup>10</sup> Hendee, J.C., AND C.P. Dawson. 2002. Wilderness management: Stewardship and protection of resources and values, 3rd ed. The WILD Foundation, Fulcrum Publ., Golden, CO.

<sup>11</sup> [https://www.moabsunnews.com/news/article\\_2f8f1422-2d13-11ec-8add-bba358568450.html](https://www.moabsunnews.com/news/article_2f8f1422-2d13-11ec-8add-bba358568450.html).

<sup>12</sup> <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

<sup>13</sup> <https://www.accessfund.org/pages/conservation-team>

conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of these comments on the BLM's draft RAMP and EA for Calico Basin. SNCC and Access Fund have the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. SNCC and Access Fund look forward to continuing to work with the BLM. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 552-2843 or via email ([leicihendrix@gmail.com](mailto:leicihendrix@gmail.com); [taimur@accessfund.org](mailto:taimur@accessfund.org); [erik@accessfund.org](mailto:erik@accessfund.org)) to discuss these matters further.

Sincerely,



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