

May 1, 2007

Laura Joss
Superintendent, Arches National Park
PO Box 907
Moab, UT 84532

**Re: Access Fund Scoping Comments for Arches National Park
Climbing Management Plan**

Dear Laura:

The Access Fund welcomes the opportunity to provide scoping comments to the Arches National Park Climbing Management Plan, and applauds this effort to provide reasonable climbing management direction for Arches National Park (Arches NP).

The Access Fund

The Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 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 15,000 members and affiliates.

The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. For more information about the Access Fund, visit www.accessfund.org.

I. INTRODUCTION

Arches National Park is renown throughout the world as one the most unique and historic desert climbing venues in America. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, diversity and concentration of climbing routes, and distinctive Entrada Sandstone. More than anything, climbers are drawn to the distinctive multi-pitch desert towers scattered throughout the park that prove exhilarating summit experiences.

Climbers have been visiting Arches since the 1960s, before it was a national park, when the impressive summit of Argon Tower was first scaled. In the more than 40 years since those first ascents in Arches climbers continue to seek out the adventurous routes found throughout the Park, especially in the Courthouse Towers area where no less than six major desert towers are located. To the increasing number of desert climbing enthusiasts, these Arches towers are on the short list of must-do climbs on the Colorado Plateau.

The Access Fund has a proud record of conservation activism regarding the many public land climbing areas found in the greater Moab area. To support our commitment to Arches National Park CMP we have worked in partnership with the local climbers who have made up an “Arches Task Force” which has volunteered dozens of hours to replacing old climbing anchors throughout the park, and “cleaning up” tattered slings used on rappel stations. For more information on this volunteer stewardship effort, see http://mountainproject.com/v/utah/moab_area/arches/105913581.

A significant number of the Access Fund's members climb at Arches National Park, with climbers representing a principle recreation user group in the park. Accordingly, the Access Fund would like to offer assistance towards this climbing management planning (CMP) initiative.¹ Following are examples of how the Access Fund has assisted land management agencies in climbing management and general planning initiatives:²

- Advice on visitation, use patterns, and climbing techniques and tools
- Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletter
- Helping conduct and/or undertake surveys of climbing activity to determine management preferences
- The Access Fund Climbing Preservation Grant program provides funds for research, monitoring, educational outreach and stewardship projects at climbing areas on an annual basis. Specific components of a recreation use plan may be appropriate for

¹ For the arches climbing management plan the NPS should define “climbing” so to not include un-roped scrambling.

² In addition, the Access Fund's publication *Climbing Management and the Development of a Climbing Management Plan* is available online at <http://accessfund.org/pdf/CM-web.pdf>. This resource will be fully revised and updated (with extensive input from federal land managers from across the country) by summer 2007. Check back to the above-noted URL for the second edition later this year. For more information on this and other Access Fund publications see <http://accessfund.org/pubs/index.php> or contact me at jason@accessfund.org or (303) 545-6772 x102.

Access Fund grant support. For more information, see <http://accessfund.org/cons/guidelines.php>.

The Access Fund recognizes that recreational access must be balanced with proper management (which may include restrictions) to protect the natural and cultural resource values and integrity of the landscape. However, it is important to note that Arches National Park contains some of the most unique, popular, and challenging technical climbing opportunities in the country. The Access Fund is concerned with the preservation of these climbing opportunities, and we provide comments herewith to assess the probable effect of the proposed climbing management initiative.

II. GENERAL COMMENTS

The Arches National Park scoping newsletter notes that “unusual climbing activities raised public interest and concern about issues associated with technical rock climbing” and that apparently these events led the Park “to take a new look at [its] climbing policies.” It is clear that the “unusual activities” of last May led directly to new climbing restrictions related to the use of fixed anchors. The Access Fund views the compendium amendments that imposed these new regulations with alarm, concerned that the actions of one individual (which were very unlikely to be repeated) would lead to widespread regulations affecting everyone. For more background on these concerns, see our letter here: <http://accessfund.org/pdf/jossltr.pdf>.

There are two primary concerns that climbers have with the revised May 9 2006 compendium and how those new rules affect climbing access: (1) climbers need to use removable fixed anchors (hammered pitons) used on “aid climbing” routes which are necessary to ascend many of the unique towers in the parks that require direct aid, and (2) climbers require permanent fixed anchors (typically expansion bolts) to descend from summits (both on existing and new routes). The climbing community core needs with regard to the CMP and fixed anchors are that the National Park Service (NPS) allow 1) climbing on existing aid climbing routes that require the use of removable hammered pitons, and 2) the occasional drilled fixed anchor to descend off the top of new climbs. We are hopeful that the current Arches CMP might identify some management scenarios that could lift these new climbing restrictions yet still address any concerns the Park may have regarding climbing management issues.

The recreational climbing resource at Arches National Park is world-class. Climbers come from all over the world to experience the distinctive tower climbing found at Arches National Park. Indeed, the climbing experiences found at Arches National Park CMP cannot be found anywhere else, and there should be a strong recognition in the Arches National Park CMP that the climbing resource represents an important value that

must be accorded a fundamental role in the planning process for Arches National Park. Accordingly, the CMP should state the significance of Arches as a climbing resource and identify management actions to preserve the area's unique climbing experience.

III. PRELIMINARY PLANNING ISSUES IDENTIFIED BY ARCHES NATIONAL PARK

The following Access Fund comments address issues that the NPS has identified as preliminary issues to be covered in the Arches National Park CMP: effects on natural and cultural resources, use of fixed hardware, designating climbing routes, development of approach trails, rock alteration, vegetation alteration, visual impacts and the effects of climbing on visitor safety and experiences.

A. Effects on Natural Resources³

Land managers are legally obliged to take measures to protect the nest sites of threatened or endangered raptors. This can be a tricky task because nest sites can vary from year to year. In addition, raptors sometimes do not use restricted nesting sites, may show breeding behavior but fail to nest, or delay nesting due to unusual climate conditions. The Arches CMP should consider whether the Park's current climbing closures (Devil Dog Spire and Bubo) are effective and appropriately focused to achieve the purpose and need for the restrictions.

Progressive resource managers operate flexible restriction systems to allow for these situations. Examples include Eldorado Canyon State Park, Colorado; Pinnacles National Monument, California; 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.

Climbers have a good record of supporting raptor nesting restrictions and continued compliance will be critical in developing and maintaining good relations with biologists and resource managers. It is the responsibility of all climbers to keep up-to-date by checking sources such as local signs and brochures, climbing magazines, guidebooks, and information produced by the Access Fund on our web site and newsletter.⁴

³ This section on "natural resources" refers to fauna. "Vegetation" is addressed below.

⁴ Much is still to be learned about how climbers impact raptors. In efforts to advance knowledge, the Access Fund has produced the handbook *Raptors & Climbers* (enclosed hereto), in consultation with biologists and land managers. This publication (Access Fund, 1997) provides common-sense guidelines for managing climbing activity to protect raptor nest sites.

The Arches CMP should consider the extent that climbing activity may be restricted due to the presence of special status species such as peregrine falcons. The Arches NP compendium already prohibits climbing activity on Bubo and Industrial Disease on the Devil Dog Spire from January 1st to June 30th. Presumably these closures are to protect cliff-nesting birds but that purpose is not specified nor is there much information published about special status wildlife in Arches National Park other than some generalized language about peregrine falcons. The Arches website notes that peregrines are “found in Arches, typically nesting in shallow caves high on cliff walls along the Colorado River.” Neither Bubo nor Devil Dog Spire are within four miles of the Colorado River, so it is uncertain whether peregrine falcons are the purpose for these climbing closures. However, the Park website does state that “Arches continues to monitor peregrines today, and one pair is known to nest in the park.”⁵ Confusingly, a Park publication also notes that in Arches peregrine falcons are “[t]ransient (through Migrant): Passes through the park in spring and fall migration, but does not remain to breed or to winter.”⁶ These two statements appear to conflict. In 2005 surveys for the Endangered Southwest Willow Flycatcher (SWFL) were performed at sites in Arches NP. The SWFL was “detected in Courthouse Wash in Arches, but no breeding territories were found. They were probably moving through to other areas outside the park.”⁷ Perhaps the SWFL is the purpose for the Bubo/Devil Dog Spire closures.

The Arches CMP should more clearly identify the reasons for such closures and provide more educational information that justifies the necessity of the closures. Find enclosed a climbing management survey, including several NPS units nationwide, that outlines what other parks and public land units do to manage climbing and cliff nesting birds. Many parks have flexible closure periods depending on the presence and success of nesting bird populations, and Arches NP should consider whether its current closure periods are justified given the practices of dozens of public land units elsewhere that have lesser restrictive policies.

B. Effects on Cultural Resources

The Access Fund has a long record of supporting resource-based closures such as those protecting cultural sites. An example of this work is the Access Fund Conservation Grant

⁵ <http://www.nps.gov/arch/naturescience/peregrine.htm>.

⁶ <http://www.nps.gov/arch/planyourvisit/upload/birds.pdf>. Confusingly, the Park’s 2005 Report seems to contradict this stated absence of breeding falcons by noting that in 2005 “both monitored [peregrine falcon] sites in Arches were occupied and successfully fledged a total of six young.” See <http://home.nps.gov/applications/parks/arch/ppdocuments/ACF1A2.pdf>.

⁷ <http://home.nps.gov/applications/parks/arch/ppdocuments/ACF1A2.pdf>.

we awarded to analyze cultural sites in the Daniel Boone National Forest at the Red River Gorge in Kentucky.⁸ In our experience, impacts from climbing on cultural resources can be mitigated through a number of means short of outright permanent closures. We encourage Arches National Park to consult with us or local climbing groups if such conflicts arise so that we may effectively help to minimize both the recreational impacts of climbing on cultural resources, and assist in defining the appropriate the scope of any closure.

Just as with the issues related to protecting special status species noted above, there exist federal laws and regulations that protect recognized historical and cultural resources. This management authority already provides the NPS with the legal means to implement protective measures that may affect recreational use patterns at Arches National Park which may adversely affect such historical and/or cultural resources. As such, it may be unnecessary to specifically address such issues in the Arches National Park CMP. This is especially true given that there appears to be no climbing conflicts at all between climbing and cultural/historical resources within Arches NP. Indeed, in reviewing the Arches website I found very little information of rock art or other cultural resources within Park, much less any documented conflicts with recreation.⁹ Unless there are specific documented cultural resource conflicts with climbing that are currently identifiable, the Access Fund suggests that the NPS use existing federal and state laws _instead of this CMP_ to manage for the protection of historic and cultural resources.

The Access Fund supports the continued inventory and evaluation of cultural resources at Arches, the establishment of educational materials informing visitors to the Park of the cultural resources there, and the development of cultural resource stewardship strategies and implementation of mitigation plans for known threats to cultural resources. If the NPS does address cultural resource management in the CMP, the draft CMP should further clarify and outline a plan for how the NPS would implement these educational, stewardship and mitigation strategies that result in lesser restrictive policies than blanket closures.

C. Use of Fixed Hardware

⁸ For more information see <http://www.accessfund.org/pubs/en/e-news3.pdf>, <http://kywilderness.com/climbing/military.htm>, and http://www.enquirer.com/editions/2000/11/19/loc_rock_climbers_to.html.

⁹ Although there are at least eight monitored cultural sites in the Park, it is unclear where they are located. See <http://home.nps.gov/applications/parks/arch/ppdocuments/ACE1A2.pdf>. Ten sites were monitored during FY04. See www.nps.gov/arch/parkmgmt/upload/2004AnnualReport.pdf.

The Access Fund has a long history of working on fixed hardware¹⁰ policies with land management agencies. Indeed, we are currently assisting all the major federal land agencies (including the NPS) to develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas. Fixed anchors, especially bolts, are sometimes controversial. In our experience concerns about bolting are almost never related to the resource impacts that may be associated with the placement and use of these traditional climbing tools, but rather to philosophical convictions. The NPS must protect the resource, but is required only to consider (not necessarily satisfy) the philosophical priorities of climbers or any other interest group. We maintain that any 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.

It is the Access Fund's position that fixed anchors are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for fixed anchors to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. Furthermore, the specific character of the rock at Arches requires that some level of fixed anchor use be authorized if climbing is to take place there at all. Accordingly, the Access Fund believes that some level of fixed anchor use must be allowed wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations. Education and outreach to the climbing community will likely mitigate any impact concerns the NPS may have regarding fixed anchors. Indeed, much of the concern related to fixed anchors has already been addressed by the efforts of the Moab-based Arches Task Force noted above.

Bans on new fixed anchors in national parks are by far the exception rather than the rule. While some parks allow new fixed anchor placements with a special use permit, typically prior authorization to place a bolt or other fixed anchor is not required in most national parks. In fact, the national parks that see the most climbing traffic and fixed anchor activity require no permit at all for the placement of fixed hardware. Many of these parks have no formal climbing management plans and simply require that climbers abide by other controlling legislation or local rules. For example, in Yosemite National Park most of the climbing is found in designated wilderness so climbers are prohibited only from using power drills when placing new bolts, however no permit is necessary. In Zion National Park—perhaps the closest national park parallel to Arches/Canyonlands—presently has no restriction on new fixed anchors. Zion climbers

¹⁰ For this CMP Arches NP should first define “fixed hardware.” The conventional definition of fixed hardware or fixed anchor” includes expansion bolts and pitons. The Park should consider how other types of fixed gear, such as slings and stoppers, should be managed by this plan.

may place new bolts without permit but are governed by seasonal raptor restrictions. As with Arches and Canyonlands, both Yosemite and Zion host world-class “aid climbing” routes that require the placement and removal of hammered piton placements for direct aid.

Other national parks have climbing management policies that explicitly allow new bolts but do not require permits. In California’s Joshua Tree National Park, the NPS only requires climbers to report new fixed anchors that are placed outside of designated wilderness (www.nps.gov/archive/jotr/activities/climbing/climbing.html); Joshua Tree is developing a permitting process for authorizing new bolts inside designated wilderness which are currently prohibited. The Black Canyon of the Gunnison National Park in Colorado has an “interim climbing management plan” (www.climbing.com/news/press/blackclimbingplan/, www.nps.gov/blca/planyourvisit/upload/BLCA_climbing_plan-2.pdf) that prohibits the use of power drills but bolts may be placed—without prior authorization—in “sections of the route that have no rock features adequate for the placement of removable anchors.”

At Rocky Mountain National Park (RMNP) in Colorado, climbing provisions in a backcountry management plan (BMP) allow new bolts but, as with the Black Canyon, urge discretion when placing permanent fixed anchors. RMNP’s policies (www.nps.gov/archive/romo/planning/wilderness_mgmt_plan/2.0%20Alternatives.pdf, www.nps.gov/archive/romo/visit/park/climbing.html) have proven so effective that other parks (Denali) have used them as a model. RMNP does not require permits for placing new fixed anchors, but bans the use of power drills and encourages climbers to use bolts as a tool of last resort and only place them to connect otherwise naturally-protected terrain. RMNP’s particular management policies¹¹ are both fair to climbers and effective in protecting the unique park environment despite a high number of climbers visiting the area each year.¹²

¹¹ <http://www.nps.gov/romo/planyourvisit/climbing.htm>.

¹² The pertinent climbing provisions in RMNP’s Backcountry Management Plan are as follows:

2.1.4.6 Climbing Management

Hardware/Equipment.

A wide range of equipment and hardware has been developed over time to be used as protection for the climber. Hammer driven pitons which widened and scarred cracks have been generally replaced by removable devices, assisting in “clean climbing” practices. However, the exploration of steeper, more difficult face climbing has led to an increase in the placement of fixed, artificial protection (e.g., bolts) by some climbers.

Fixed Hardware Application Processes

Some national parks require that climbers obtain a permit prior to placing any new fixed anchors. At Acadia National Park in Maine, for example, the NPS requires climbers hoping to place new anchors to present a permit application to a climbing advisory group who then issues a recommendation to the park whether to grant the bolting request. (see www.nps.gov/acad/planyourvisit/climbmgtpplan.htm). Some parks, such as the City of Rocks National Reserve in Idaho (www.nps.gov/ciro/parkmgmt/upload/Climbing.pdf), have streamlined application processes that are reviewed by a climbing ranger. A recent CMP at the New River Gorge National River in West Virginia uses fixed anchors as a resource protection tool (see www.nps.gov/neri/upload/neri_finalcmp.pdf). Even in areas with legal requirements for high land conservation standards, such as the Obed Wild and Scenic River (www.nps.gov/archive/obed/final-CMP.pdf), land managers allow new fixed anchors through advisory committees and permit processes.

Backcountry/Wilderness Management Plan and Environmental Assessment Plan Alternatives Rocky Mountain National Park 2-40 The use of removable and fixed anchors, as well as other climbing equipment, is appropriate in wilderness. However, fixed anchors must be placed judiciously and closely managed in order to prevent the degradation of wilderness resources and character. Where anchor points are necessary for climber safety, the use of removable equipment is desired and highly recommended. Fixed anchors should not be placed merely for convenience or to make an otherwise "unclimbable" route climbable.

Fixed anchors (e.g., webbing, bolts, pitons, chains) currently in place may remain. They may be replaced, or removed, by individual climbers, during a climb, or the NPS, during park operations. Safety remains a responsibility of the climber. The NPS will not, as policy or practice, monitor fixed anchors to evaluate their condition or accept any responsibility for fixed anchors.

The placement of new fixed anchors may be allowed when necessary to enable a safe rappel when no other means of descent is possible, to enable emergency retreat, during self rescue situations. The infrequent placement of new fixed anchors is allowed when ascending a route to connect terrain that is otherwise protected by removable anchors (e.g., one crack system or other natural feature to another) or when there are no features which will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during the ascent (e.g., traditional face climbing). New, bolt intensive climbing routes (e.g., sport climbs, bolt ladders) are not appropriate in wilderness and should not be created.

The Park may place and maintain fixed anchors for administrative and emergency purposes. When a climber determines the need for anchor placement or replacement, this must be accomplished in compliance with regulated and permitted standards (e.g., power drills prohibited). At this time there is no permit or approval system in place, or proposed, with regard to the placement of fixed anchors; however, one may be developed and implemented if the Park determines it is necessary, through research and monitoring, to protect natural and cultural resources.

At Arches National Park a simple permit process could be established whereby the party seeking to place new fixed anchors submits to the NPS an application verifying either that (1) the new bolts would be replacing a descent anchor currently comprised of fixed pitons (or other fixed anchors such as stoppers), or (2) the new bolts are being placed at a strategic location that would mitigate natural resource impacts, lessen congestion on other routes, or increase safety. We suggest there would be no need for climbers to notify the NPS if they were simply replacing unsightly webbing with anchors chains on existing fixed anchors.

Wilderness

Since much of Arches National Park is managed as wilderness,¹³ Arches National Park should consider how special wilderness regulations could affect climbing in the Park. The Access Fund has been working since 1989 with all of the federal wilderness management agencies to resolve the issue of how fixed anchors should be managed. We also have negotiated directly with the environmental community to achieve broad support for a national policy which allows, but limits, the use of new fixed anchors in wilderness. With regard to fixed climbing anchors in designated wilderness, we believe:

1. Some level of fixed anchor use must be allowed wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis. Surveys of the climbing community show that the vast majority of climbers support this position.
2. Climbers, not the government, should bear the responsibility for determining when to place safety anchors and how to use these tools.
3. 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. The continued use of fixed anchors, if properly managed, will not degrade wilderness resources and values.
4. 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.
5. The Access Fund supports the ban on power drills in wilderness, and actively promotes the concept that bolts are a “tool of last resort.”

¹³ Because the President has recommended to Congress that most of Arches National Park become designated wilderness, National Park Service policy dictates that Arches National Park manage the recommended wilderness as though it were already designated wilderness.

The Access Fund has long contended that the resource concerns that wilderness land managers have related to fixed anchors can easily be dealt with through the enforcement of power drill restrictions in wilderness-managed zones. The overwhelming majority of climbers have never—and will never—place a fixed anchor, and the few remaining first-ascentionists are unlikely to drill anchor holes by hand.

D. Designating Climbing Routes

Issues related to the “designation” of new climbing routes are perhaps the most important part of this CMP because such designations—and the way the NPS manages such zoning—will affect most of the other issues in this CMP. It is extraordinary for the NPS to approve climbing *zones*; the normal course of action is to close only selected locations to protect identified natural or cultural resources. Occasionally, social values have restricted route locations. However, it may be unprecedented on national park land were Arches NP to only allow climbing in designated zones rather than restricting only limited areas with special legal protections.

Because the Arches CMP concerns a national park, it is important that the NPS institute a presumption that new climbing areas be authorized within Arches everywhere there is no resource conflict, rather than the converse where the onus is on the new-routes ascensionist to establish or argue for permission in those areas where there is no finding of adverse impact on protected Park resources within the climbing zone. The presumption that recreation should be allowed unless there’s a valid reason to limit such activity is most consistent with the NPS’s mandate to

preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.¹⁴

Unless there is a clear, imminent need to prohibit new routes based on objective environmental or social data, the presumption should remain that new climbing routes are authorized everywhere within Arches National Park.

Arches National Park may want to review CMPs established by other NPS units. Two exemplary CMPs that address many of the same issues that concern the NPS at Arches are:

¹⁴ <http://www.nps.gov/aboutus/mission.htm>.

The New River Gorge National River (<http://www.nps.gov/neri/cmp>)

The Obed Wild and Scenic River (<http://www.nps.gov/obed/final-CMP.pdf>)

As in the above noted NPS climbing plans, Arches NP should develop criteria that would guide and direct decisions on managing new climbing routes. A first consideration for management action by the NPS should determine whether potential impacts to resources can be mitigated through climber education.¹⁵

In cases where documented sensitive resources are present, new routes could be allowed by permit. The Access Fund believes the NPS should focus on responding with reasonable lesser restrictive alternatives to address resource concerns rather than designating specific areas as closed to climbing without valid justification. The NPS should also consider effective means by which it can notify the climbing public of any interim or permanent climbing policies using the local climbing community, signage or other information at the visitor center, or media outlets.

If any restrictions are considered, the NPS should develop a criterion/question that asks: “are climbing activities likely to have an adverse impact on the visitor experience, cultural resources or special status plant or animal communities present within the management area?” In developing this kind of analysis, the NPS should define precisely what “adverse impact” means within this context. Without such a clear definition it is difficult to proceed without arbitrary determinations and management actions. By clearly setting impairment standards the NPS will prevent any future arbitrary evaluations that climbing impacts require prohibiting new climbing opportunities within Arches.

E. Development of Approach Trails

Off-trail hiking to access climbing routes is not prohibited in Arches National Park.¹⁶ The Arches website simply encourages climbers “to access climbing routes via established trails, slickrock or sandy washes.”¹⁷ Clearly, Arches climbers at some point must leave

¹⁵ Even after the Delicate Arch controversy there is very little educational material about climbing in the Park visitor center. Information about climbing could prove valuable to both climbers and the general public who may view climbers along the main Park road. As with the Obed WSR and New River Gorge climbing plans, public outreach can make or break any planning process or its eventual implementation.

¹⁶ The current Arches compendium prohibits “leaving a trail or walkway to shortcut between portions of the same trail or walkway or to shortcut to an adjacent trail or walkway is prohibited.”
<http://data2.itc.nps.gov/parks/arch/ppdocuments/ARCHCompendium20061.pdf>.

¹⁷ <http://www.nps.gov/arch/planyourvisit/climbing.htm>.

formal trails or parking areas to reach their chosen climbs. This has always been the case. The Arches CMP should consider to what extent it will formally incorporate into the Park trail system the necessary climbing approach trails located throughout the Park. Of primary concern to the NPS should be the development of approach trails to a few of the more popular climbing locations throughout the Park. While not every climbing route needs a developed access trail, Arches should consider how to effectively limit impacts from foot traffic by climbers.

At Indian Creek south of Moab the BLM surveyed climbing activity and worked with the local climbing community to localize their approach impacts and agreed to a cost-sharing agreement with the Rocky Mountain Field Institute (sometimes with Access Fund Climbing Conservation Grant funds) to reinforce existing climbing trails and improve them into durable, long-lasting surfaces. Exemplary work by RMFI in the Moab area can also be found on the approach trail to Castleton Tower in Castle Valley. For more information see www.rmfi.org.

Many national parks have incorporated climber trails into their formal trail networks, but limit the size and scope of such trails to be more appropriate to the limited amount of traffic these trails will receive relative to the many popular hiking trails located throughout the park used by the general public. Some parks, such as Joshua Tree and Pinnacles National Monument, post small signs or posts at the beginning of climber trails which have small climbing symbols on them such as carabiners or a climbing figures. These symbols key climbers into the location of approach trails but limit unnecessary use by the general park visitor.

F. Vegetation and Rock Alteration

The Access Fund supports natural resource management decisions based on thorough information about the condition of field resources and visitor use. The use of baseline data is critical to making informed decisions when imposing management prescriptions protecting natural resources. The Arches CMP should clarify how such information will be gathered and a timeline identified for an inventory of natural resources and associated climbing impacts or potential impacts.

Any analysis of the effects of recreational use on resource values should begin by looking at patterns and levels of use, as well as the location and sensitivity of the resource values. Only once this information has been obtained can a determination be made as to whether any management intervention is necessary for protection of that resource value. If management intervention is required to mitigate climbing impacts to vegetation we encourage resource managers to work closely with the Access Fund or other established and experienced local climbing advocacy groups on developing and implementing a

consistent management protocol to preempt such impacts. Our broad experience of working on resource protection issues nationwide can help develop effective management approaches which do not require an intensive commitment of administrative resources yet ensure effective resource protection.

While resource preservation is an integral component of the NPS mission, Arches National Park must also manage to provide for recreational opportunities. Indeed, recreational climbing is a historic and celebrated use of Arches National Park. For every permissible activity on NPS land there is an implied *de minimus* commitment of resources necessary to provide for that activity. Hikers need trails built which alter the landscape; horseback riders need hitching racks; tour groups need large parking lots paved; and the general public now expects extensive visitor centers and interpretive exhibits such as the one built at Arches. This *de minimus* commitment of resources must be allowed for rockclimbing to continue as a legitimate use of Arches National Park. While the occasional accidental dislodging of rocks must be expected in an activity like rockclimbing, intentional “trundling” of rocks should be discouraged. The NPS can address this issue by educating the climbing public as to safety and ecological concerns through on-site signage and community outreach. Further, the wholesale removal of organic material from cracks or the rock face should likewise be discouraged.

Significantly, there are federal and state laws and regulations that currently protect sensitive and special status flora. This management authority already provides the NPS with the legal means to implement protective measures that may affect climbing use patterns at Arches National Park. Unless there are specific natural resource-recreation conflicts that are currently identifiable, the Access Fund suggests that the NPS use existing federal and state laws_ instead of this Plan_ to manage for the protection of special status flora. Park policies to protect natural resources may be accomplished through provisions in the Arches NP compendium which prohibit adverse impacts to protected flora.

G. Visual Impacts and the Effects of Climbing on Visitor Safety and Experiences

While the Arches CMP process should consider how climbing impacts the visual resource and visitor safety, there appear to be relatively few such conflicts in Arches National Park. The visual quality and aesthetics of Arches National Park contribute to the deep personal attachment that many people have for the area; however, the work of the local Arches Task Force (see http://mountainproject.com/v/utah/moab_area/arches/105913581) has already addressed this issue throughout the Park, especially in the Courthouse Towers area.

Any visual and audio impacts caused by climbers should be considered in context with other visual and audio impacts from other sources, so that the most significant audio-visual impacts can be mitigated first. For example, the parking lots at Arches typically contain loud RVs and crowds of noisy tour groups. Are the audio-visual impacts associated with these phenomena more, less, or equally significant than those caused by climbers? Before the visual and audio impacts of climbers are considered problems by the NPS, Arches should do a comprehensive analysis of both visual and audio impacts at Arches considering all sources. These impacts can be charted and values can be placed on them. This data, in the end, can help Arches determine what noises are most problematic, what user groups or natural resources are most impacted, and identify the appropriate solutions to each discrete problem.

It is not clear whether the NPS considers the audio-visual impacts of climbers at Arches to be an issue meriting management response. If so, then the NPS should document the source of its concern regarding this type of impact. Have other visitors complained about the noises and visual distraction of climbers, and if so how many and how may the source of the complaints be mitigated without public use restrictions?

Visitor safety concerns with regard to technical rock climbing—as opposed to the several scrambling SAR operations conducted each year—are virtually non-existent with regard to climbers or at least commensurate with the safety conditions in other national parks where climbing is not restricted. This is also true concerning other park visitors with relation to climbing activity. While some automobile drivers may strain to view climbers or park irresponsibly along the road shoulder, the NPS may avoid this concern by enforcing existing traffic rules, posting some sort of warning signs, or even establishing expanded parking pullouts in any problem or high-use areas. No other national parks prohibit or restrict climbing based on perceived dangers presented by sightseer traffic. Consider Zion National Park where every busy weekend of the year several climbers are readily apparent immediately above the main road through Zion Canyon. In Zion, the NPS tour buses actually promote climbers as park attractions and the NPS website provides information on area closures and route descriptions.¹⁸ In short, most visual impacts related to climbing have already been dealt with by the Arches Task Force (now Moab Area Climbers' Association), and any potential safety issues can be addressed by the Park enforcing current traffic rules.

IV. IDENTIFICATION OF ADDITIONAL ISSUES

The Arches National Park CMP should also address the following additional issues:

¹⁸ <http://www.nps.gov/zion/planyourvisit/climbing.htm>.

A. Parking Facility Issues

Issues concerning appropriate transportation related facilities (parking and pullouts) and protection levels for natural, cultural and other resource values from transportation impacts are all relevant and necessary for consideration in this CMP. Accordingly, the NPS should identify ways that additional parking, if any, may provide safe, environmentally sound, convenient, and effective (i.e., climbers and other visitors will use them) pullouts to avoid congestion by climbers and the general public. The current Arches National Park Transportation Plan may effectively serve this purpose.

B. Education/Community Outreach

Education and community outreach should be the centerpiece of any land management plan that may, in some form, affect the activities of an established user group. The Arches National Park CMP Plan should consider the role that education and public outreach will play in managing climbing and promoting climber stewardship and minimum impact practices. For example: what are the most appropriate materials or techniques that can be used to reach climbers? Where should these techniques and materials be deployed to promote an understanding of resource values and sensitivity? The Arches National Park CMP should include some degree of education/community outreach in each alternative.

If the Arches CMP includes any alternatives with provisions affecting the use patterns of climbers, then the public should be informed of the need for such changes, and the thoughtful way in which the NPS decided to implement increased management of the area. Outreach before, during and after the planning process (during implementation) is critical for a smooth transition toward new Arches National Park climbing policies. Likewise, continued education of the user group concerning the environment and how/why the area is managed is also important.

To effectively engage in community outreach for the Arches National Park CMP the NPS should consult regularly with a range of climbing interest groups and individuals who have a demonstrated interest Arches National Park climbing policies or are likely to be affected by new restrictions. We recommend that all issues pertaining to climbing in the Arches National Park CMP, including climbing use patterns, climber traditions and history, or information about technical climbing tools and ethics, be dealt with through a local climbing advisory/working group. Such a group can facilitate gathering, sharing and processing information on specific issues.¹⁹

¹⁹ Last year for the fixed anchor replacement project, the Access Fund helped organize a group of Arches regulars (the “Arches Task Force”) who were further assisted by the American Safe Climbing Association to replace and clean up fixed climbing anchors throughout the Park (again, see

The following organizations, interested individuals may be helpful regarding any management planning or policy implementation at Arches National Park.

Moab Area Climbers' Association

Eve Tallman - eve@grand.lib.ut.us

Steve "Crusher" Bartlett - stephenbartlett@yahoo.com

Sam Lightner - samlightnerjr@mac.com

Ralph Ferrara - ralphferrara@hotmail.com

Joe Slansky - joeslansky@gmail.com

Brad Brandewie - brad@piquaclimber.com

The Access Fund

Jason Keith, Policy Director - jason@accessfund.org

The American Alpine Club

Jim Donini - donini@ouraynet.com

C. Sunset/Reauthorization Date

The Arches National Park CMP should indicate the duration of the proposed management initiative. Typically such plans have reauthorization dates of five years following plan approval to allow for any necessary revisions. Accordingly, the NPS should provide a time-period specifying the effective duration for this proposed Arches National Park CMP. At that time Arches National Park may then adjust again its policies to meet current needs or standards

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I hope the above information helps Arches National Park identify the appropriate scope for the Arches National Park CMP and clarifies ways in which the Access Fund can be of assistance. Please do not hesitate to contact me if you require more information, or would like to discuss any of the points covered in this comment letter.

The Access Fund looks forward to working with the NPS and any interested parties throughout the planning process for Arches National Park. The world-class character and

http://mountainproject.com/v/utah/moab_area/arches/105913581). This group has informally reorganized as the Moab Area Climbers' Association.

long climbing history of this important area underscores the need for appropriate climbing management policies at Arches. At the same time, growing interest in local stewardship projects in Arches by the climbing public is encouraging and provides a timely opportunity to gain public investment in effective management policies for this special area.

Sincerely,

Jason Keith
Policy Director
The Access Fund

Enclosures

Cc: Steve Matous, Executive Director, The Access Fund
Moab Area Climbers' Alliance