

## ROARING FORK CLIMBERS COALITION

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**RE: Access Fund, Western Colorado Climbers' Coalition, and Roaring Fork Climbers Coalition  
Comments to the Black Canyon of the Gunnison National Park Wilderness and  
Backcountry Management Plan**

Mr. Stahlnecker and the Black Canyon National Park Planning Team:

The undersigned non-profit climbing organizations welcome this opportunity to comment on the Climbing Management Plan ("CMP") elements outlined in the proposed Wilderness and Backcountry Management Plan for the Black Canyon of the Gunnison National Park (the "Black"). Overall, this CMP does an excellent job of recognizing the area's strong traditional climbing ethic and providing a framework under which to protect natural resources at the Black Canyon while preserving internationally-significant wilderness climbing opportunities. Many of our members regularly climb and camp in the proposal area and have a strong interest in wilderness management generally and climbing policy in particular. We support the general framework for this CMP and suggest herein a few significant changes to the proposal that will protect wilderness resources while also preserving the unique climbing opportunities found only in the Black Canyon.

### **The Access Fund**

The Access Fund is a 501(c)3 non-profit advocacy and conservation organization representing the interests of 1.4 million American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 10,000 members and affiliates. We perform five core programs on the national and local levels: climbing management policy; stewardship and conservation; local support and mobilization; land acquisition/protection; and education. The Access Fund currently holds memoranda of understanding concerning climbing management and resource conservation with the National Park Service, the Bureau of Land Management, and the United States Forest Service.<sup>1</sup> Colorado is one of our largest member states, and several of the Access Fund's affiliate local climbing organizations have an interest in Black Canyon climbing. The Access Fund is also a member of the Outdoor Alliance, a national coalition representing the nation's climbers, hikers, backcountry skiers, mountain bikers and paddlers ([www.outdooralliance.net](http://www.outdooralliance.net)). Each of these interest groups also has a stake in the management of the proposal area and the Black Canyon National Park should consult these groups to better understand how this management proposal may affect these activities. To learn more about the Access Fund, see [www.accessfund.org](http://www.accessfund.org).

## **Western Colorado Climbers' Coalition**

The Western Colorado Climbers' Coalition (WCCC) is focused on land acquisition and stewardship of climbing areas in the Western Colorado area for the public's use and enjoyment. The WCCC is dedicated to preserving access to Western Colorado's climbing areas through land stewardship, education and land use advocacy. For more information, see <http://www.westernslopeclimbers.blogspot.com>.<sup>2</sup>

## **Roaring Fork Climbers Coalition**

The Roaring Fork Climbers Coalition (RFCC) mission is to promote climbing and preserve access to cliffs in the Roaring Fork Valley and surrounding area. The RFCC seeks to give climbers a voice with land managers and policy makers in order that climbing interests be represented in the creation or revision of land-use plans. The RFCC promotes unity and cooperation within the local climbing community, as well as build ties with local land managers and organizations. The Roaring Fork Valley is a great place to be a climber, and the RFCC looks forward to working with all parties involved to keep it that way. For more information, on the Roaring Fork Climbers Coalition, see <http://www.roaringforkclimbers.com>.

## **Black Canyon Climbing**

The Black Canyon of the Gunnison is one of the country's most significant traditional rock climbing locations and has an international reputation as one of America's most adventurous wilderness climbing areas. Big wall climbs were established here in the early 1960s by pioneers such as Layton Kor including the Painted Wall, Colorado's "tallest cliff." Through the decades several long free-climbing and big wall classics were established in the Black Canyon including The Cruise, Air Voyage, Hallucination Wall, Astro Dog, Atlantis, and many others.<sup>3</sup> The Black is also the site of many difficult and cutting edge traditional free climbs known as much for their boldness as difficulty. The Black Canyon offers a unique climbing experience and is considered by many as the epitome of long traditional backcountry wilderness climbing. The Black's wilderness climbing opportunities and dramatic setting make the Black Canyon one of the most unique and important climbing areas in the US and internationally.

## **COMMENTS**

The Access Fund, Western Colorado Climbers' Coalition, and Roaring Fork Climbers Coalition are encouraged by the proposed policies found within the draft CMP as we feel that much of this proposal reflects best management practices for wilderness climbing. The worthy goals of this proposed CMP are: 1) preserve the natural resources in the Black Canyon while providing for recreational climbing; 2) set forth a clearly defined set of guidelines that preserves the area's backcountry and wilderness character; 3) provide written regulations that can be used to educate climbers; and 4) provide written guidelines that law enforcement can use to preserve the wilderness and backcountry character and the climbing environment in the Black Canyon.<sup>4</sup> We support these goals. The Access Fund, WCCC, and RFCC provide the following specific comments and recommendations to help fulfill the important goals of this CMP.

## **The Black Canyon National Park Should Use Adaptive Management Techniques for New Fixed Anchor Authorizations**

The Black Canyon is a world-class multi-pitch traditional climbing area where climbers occasionally need the use of fixed anchors for ascent and descent. This draft CMP would authorize the placement of new fixed anchors without written application or prior approval within the Black's Primitive Zone and the CNRA, but prohibits all new fixed anchor placements within the Black's Pristine Zone. However, the precise boundaries between the Black's Primitive and Pristine Zones are difficult to distinguish from the limited detail available in the draft Plan. Providing more definitive boundary descriptions (including better maps along with verbal descriptions) for the Primitive and Pristine Zones would clarify the matter for climbers and Park staff alike, while also raising awareness of the Park's sensitivities and increasing compliance with new rules.

The Black Canyon National Park should model this Plan on the successful National Park Service plans used in Rocky Mountain and Zion National Parks where a much higher volume of climbing occurs in designated wilderness yet managers impose no specific quotas on the number of new fixed anchors. Rather, under these successful plans resource indicators are monitored to determine whether any impacts are caused by fixed anchor use, and if so whether restrictions are necessary. Instead of focusing too closely on the number of bolts, the Black Canyon National Park should formalize carrying capacities limits based on visitor experience and resource protection (VERP)<sup>5</sup> studies. Through the use of VERP, the Black Canyon National Park can identify strategies to monitor the effects of climbing and fixed anchor use on park resources and visitor experience and formulate management policies that ensure the protection of wilderness resources. In so doing the Black Canyon National Park should consult the practice at Zion National Park<sup>6</sup> to identify and monitor relevant resource indicators and standards, and develop management options for fixed anchors as needed. Zion's fixed anchor policy is as follows:

Bolts should be considered the tool of last resort by visitors who are creating anchors. As mentioned above climbers, canyoneers, and others creating anchors will be encouraged to use natural colored anchor material (slings and hangers). The park will continue to monitor bolting in the backcountry.<sup>7</sup>

Rocky Mountain National Park also employs an effective fixed anchor policy in its Backcountry/Wilderness Plan<sup>8</sup> as follows:

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.

If the Black Canyon National Park must place an annual quota on the placement of new fixed anchors, this plan should increase the number of new fixed anchors allowed annually in the Black Canyon's Pristine Zone from 15 to 30. The draft CMP establishes an "indicating standard" of 15 new fixed protection anchors annually within the Black's Primitive Zone and the continued authorization of new fixed protection anchors is dependent on a number of factors including "[r]emaining within the indicating standard of 15 new fixed protection anchors annually." The proposed indicating standard was based on a five-year average, but the standard is applied annually. Expanding the indicating standard's applicability to a five-year period is a better way to keep route development at historic levels. Moreover, the Black Canyon has over fifty years of new route development history, with the most prolific development occurring in the 1960s, 1970s and 1980s. Thus, the proposed annual standard of 15 new fixed protection anchors is based on limited data and should be reevaluated regularly using the latest information. If an adaptive management process for new fixed anchors is not adopted by Park planners, an annual standard of at least 30 new fixed protection anchors is a more realistic annual total and likely more consistent with the actual annual average of new fixed anchors in the Black Canyon over a five-year time span.

#### **National Park Service Director's Order #41**

We support the National Park Service wilderness climbing management provisions proposed earlier this year in Director's Order #41. In March of 2011, the Access Fund provided comments generally supporting Section 7.2 of the *Draft Director's Order #41 January 2011*.<sup>9</sup> This draft CMP for the Black Canyon specifically states "[t]he occasional placement of a fixed anchor for belay, rappel or protection purposes does not necessarily impair future enjoyment of the backcountry or wilderness, nor violate the Wilderness Act provided its placement is in accordance with the National Park Service Director's Order 41..."<sup>10</sup> However, no final version of Director's Order #41 has been officially adopted as of this comment deadline. Assuming the final version of Director's Order #41 is substantially similar to the January 2011 draft, we support its use to govern the placement of fixed anchors in the Black Canyon. However, the final Director's Order #41 may not be the appropriate guideline for placing fixed anchors,

and site specific considerations should in that case determine the appropriate use of fixed anchors in the Black Canyon's Primitive Zone.

### **Zone Boundaries**

As noted above, the proposed Wilderness and Backcountry Management Plan for the Black Canyon does not clearly identify the specific boundary between the Primitive and Pristine Zones. This specific boundary has significant implications for climbers who may be banned from placing any new fixed anchors in the Pristine Zone, and are likely to have limits on placing new fixed anchors in the Primitive Zone. The Park's interactive map<sup>11</sup> identifies the boundary between the Primitive and Pristine Zones as running right through the Painted Wall which is one of the most important and historically significant climbing walls in the Black Canyon. Climbers should have the ability—pursuant to the final rules governing fixed anchors in the Primitive Zone—to climb and place the occasional fixed anchor for ascent and descent on the Painted Wall, and this key area should be in the Primitive Zone and not the Pristine Zone. Black Canyon planners should modify this boundary and place it in the first gully immediately downstream from the Southern Arête (which forms the leftmost side of the Painted Wall)<sup>12</sup> in order to preserve the unique wilderness climbing opportunities found on the Painted Wall.

### **A Climbing Representative Should Be Included on the Park's New Interdisciplinary Committee**

The draft CMP proposes an interdisciplinary committee to advise the superintendent regarding modifications for the authorized use of fixed anchors in the Black's Primitive Zone (and the CNRA).<sup>13</sup> This interdisciplinary committee would include a member of the park's climbing staff, wilderness staff, visitor protection division, and resource division.<sup>14</sup> The interdisciplinary committee and the proposed built-in process to modify the CMP based on observed conditions is an excellent approach. However, Park planners should consider adding at least one climber to the interdisciplinary committee from a local climber organization to increase the committee's effectiveness, communication, and to help foster a working relationship with the climbers most concerned with and knowledgeable about climbing in the Black Canyon. The Roaring Fork Climbers Coalition, the Western Colorado Climbers' Coalition, the Four-Corners Climbers Coalition,<sup>15</sup> and the Telluride Mountain Club<sup>16</sup> are four local climbing organizations that would be a good fit for the interdisciplinary committee. At the very least the Black Canyon National Park should designate a liaison from the climbing community who can meet regularly to the interdisciplinary committee and inform the community of any Park actions affecting climbing management or inform the Park of any significant changes in climbing activity.

### **Commercial Guiding in the Black Canyon National Park**

A guiding ban in the Black Canyon is unnecessary and unjustified. Historically, climbers interested in a Black Canyon wilderness climbing experience could hire a professional guide. The Access Fund and the undersigned organizations support climbing opportunities in whatever form and style climbers pursue, including with a guide. This draft Plan acknowledges that “guided climbing comprises a small percentage of total climbing activity (12% or 136 climbers in 2009, 3% or 40 climbers in 2010)” and “guided climbing could help enhance the natural character by practicing and teaching leave no trace ethics.” Yet without explanation Park planners would prohibit guiding because “guided climbing does not support the goal for the inner canyon zone of providing a visitor experience that is challenging, self-

reliant, and adventurous.”<sup>17</sup> We disagree with this assessment and believe that some level of guided climbing should be allowed in the Black Canyon.

Climbing in the Black Canyon is always challenging, adventurous, and requires a high degree of self-reliance whether guided or not. The objective hazards are the same for guided and non-guided climbers, and the inner canyon’s wilderness character and remoteness make climbing in the Black exceedingly “challenging, self-reliant, and adventurous” for every climbing party regardless of whether a guide was hired. Further, all climbers (including those guided) are self-reliant in the Black because all routes require climbers to climb out (or hike out if they fail). Carefully managing the number of guiding permits and/or designating guided routes and locations is a better means for preserving the wilderness climbing experience at the Black Canyon than an unnecessary and unjustified ban of guided climbing.

### CONCLUSION

The Access Fund, Western Colorado Climbers’ Coalition, and Roaring Fork Climbers Coalition applaud the Black Canyon National Park’s effort in this draft Plan to achieve the appropriate management balance between resource protection and recreational climbing. This draft Plan is an excellent effort and with a little more refinement could become the standard for wilderness climbing management for sub-alpine zones. We urge you to adopt adaptive management techniques instead of specific annual bolt quotas, move the Primitive/Pristine Zones boundary to exclude the Painted Wall, add a climber to the interdisciplinary committee for climbing management, and allow some level of guided climbing in the Black Canyon. Thank you for your invaluable work on this important planning project. Please contact us with any questions or concerns raised in this letter.

Best Regards,



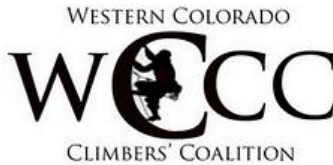
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## ROARING FORK CLIMBERS COALITION

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Roaring Fork Climbers Coalition  
Western Colorado Climbers' Coalition  
Four-Corners Climbers Coalition  
Telluride Mountain Club  
American Alpine Club  
American Mountain Guides Association

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<sup>1</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/2009%20USFS%20MOU.pdf> ,  
<http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/AF%20BLM%20MOU.pdf>,  
<http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/AF%20NPS%20MOU.pdf>

<sup>2</sup> See also <http://www.facebook.com/pages/Western-Colorado-Climbers-Coalition/79051078111?sk=wall>.

<sup>3</sup> See <http://www.mountainproject.com/v/black-canyon/105744397>.

<sup>4</sup> Wilderness and Backcountry Management Plan Environmental Assessment, Appendix C at p. 197.

<sup>5</sup> See <http://planning.nps.gov/document/verphandbook.pdf>.

<sup>6</sup> See <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm>

<sup>7</sup> Zion Backcountry Management Plan at 37. See the Access Fund's comments to the 2005 Zion National Park Backcountry Management Plan at [http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/UT\\_Zion%20MP\\_16\\_10.4.2005.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/UT_Zion%20MP_16_10.4.2005.pdf).

<sup>8</sup> See Rocky Mountain National Park's Backcountry/Wilderness Management Plan at 2-40,  
[http://www.nps.gov/romo/parkmgmt/upload/alternatives\\_2.pdf](http://www.nps.gov/romo/parkmgmt/upload/alternatives_2.pdf).

<sup>9</sup> [http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS\\_DirectorsOrder41\\_Comments\\_3.10.2011.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_DirectorsOrder41_Comments_3.10.2011.pdf)

<sup>10</sup> See Wilderness and Backcountry Management Plan Environmental Assessment, Appendix at p. 198.

<sup>11</sup> [http://imgis.nps.gov/geocortex/viewer/nps/?Viewer=Black\\_Canyon\\_NP\\_Wilderness](http://imgis.nps.gov/geocortex/viewer/nps/?Viewer=Black_Canyon_NP_Wilderness)

<sup>12</sup> This gully intersects the Gunnison River at the following approximate coordinates: 38° 34' 30.32" N, 107° 44' 27.13" W.

<sup>13</sup> Wilderness and Backcountry Management Plan Environmental Assessment, Appendix C at p. 200-202.

<sup>14</sup> *Id.*

<sup>15</sup> <http://www.freewebs.com/4cornersclimbing/>

<sup>16</sup> <http://telluridemountainclub.wordpress.com/>

<sup>17</sup> Wilderness and Backcountry Management Plan Environmental Assessment, Appendix E at 235.