



Protect America's Climbing

March 10, 2014

ATTN: Greg Jarvis, Project Manager
Denver Service Center
National Park Service
12795 W. Alameda Parkway
Lakewood, CO 80228

DRAFT

RE: Access Fund Comments on the Draft Wilderness Management Plan and Environmental Impact Statement for Jimbilnan, Pinto Valley, Black Canyon, Eldorado, Ireteba Peaks, Nellis Wash, Spirit Mountain, and Bridge Canyon Wilderness Areas

Dear Greg Jarvis,

The Access Fund appreciates this opportunity to provide feedback on the Draft Wilderness Management Plan for wilderness areas within Lake Mead National Recreation Area (NRA). Lake Mead NRA's wilderness areas provide unique opportunities for remote, adventurous wilderness rock climbing. The Access Fund, its members and supporters, and the rock climbing community at large, highly value wilderness climbing experiences and are interested in helping Lake Mead NRA preserve its Mojave Desert wilderness climbing resources for future generations.

The Access Fund

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and conserve the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with nearly 10,000 members and affiliates. We currently hold 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.¹ For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

The Access Fund maintains that while this otherwise effective Draft Wilderness Management Plan (the Plan) does much to preserve wilderness values and protect cultural resources in the Lake Mead NRA, it

¹ See

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

will also unnecessarily impose severe restrictions on the longtime activity of rock climbing. The Plan fails to propose a range of alternatives, regarding climbing management, that reflect the National Park Service's range of wilderness rock climbing management practices as well as the issues raised, and solutions proposed, by local rock climbers and national climbing advocates. The Plan only proposes two options for managing fixed anchors: no action and a preferred alternative that hinges on an interpretation of Director's Order #41(DO#41) that misinterprets terminology, selectively ignores principles and lacks relevance to the climbing resources and visitation patterns at Lake Mead NRA.

Proposing to reduce the number of climbing routes based on an inappropriate definition of the term 'bolt-intensive' and the misconception that 'bolt-intensive' climbing routes fundamentally attract high levels of visitation is inarguably antithetical to anecdotal evidence (from local climbers and Lake Mead NRA staff) as well as several well-respected, NPS funded study findings. In fact, there are no recreation studies that support the preferred alternative's fixed anchor management proposals. The majority of the Plan's rationale for the proposed reduction of fixed anchors is dubious and conflates wilderness science/policy with cultural resource protection. The Plan avoids directly addressing the difficult to define, and yet to be inventoried, cultural resources that Lake Mead NRA believes are negatively impacted by the existence of an undefined number of fixed anchors. Not only are the Plan's assumptions of the impacts related to fixed anchors contradictory to recreation research and other Department of the Interior wilderness policy, but the Plan outwardly discriminates against climbers by proposing lower group encounter thresholds and different wilderness standards for climbers compared to all other wilderness visitor groups.

The following sections detail the Access Fund's analysis of the Plan's climbing management proposals and offer alternatives that will protect Lake Mead NRA's wilderness resources and character without negatively affecting legitimate and appropriate wilderness rock climbing activity.

Lack of alternatives associated with climbing management

One of the six stated needs for the Plan is to address issues related to climbing management.² The main reason for re-writing the April 2010 version of the Plan, resulting in the January 2014 version, was to address issues raised by rock climbers and American Indian tribes about fixed anchors and climbing management.³ Therefore it is important to note that despite the stated needs for the Plan, the contentious nature of the issue, and the high volume of comments (on the April 2010 Plan version) submitted to the National Park Service regarding climbing management at Lake Mead NRA, the current Plan lacks any range of alternatives regarding climbing management beyond *No Action* and the *Preferred Alternative*.

In fact, the proposed climbing management strategies are verbatim for *Alternative B* (preferred) and *Alternative C*. The National Environmental Policy Act (NEPA) requires the National Park Service to consider a range of reasonable alternatives for the future management of national park units. According to the law, in developing these alternatives, a park unit must review the legislation that established the

² The Plan at pages 5 and 6.

³ Id. at page 4.

site, be sure that future management is consistent with the purpose and significance of the site, and **address the issues that the public has raised** in order to manage the site in the most effective way. An appropriate range of alternatives is required to be included in National Park Service Environmental Assessments when there is an unresolved conflict concerning alternative uses of available resources.⁴ Such is the case with wilderness climbing management at Lake Mead NRA.

The lack of the Plan's alternatives regarding climbing management is especially problematic for the Access Fund, and the climbing community at large, because the management actions described in the Plan's *Alternatives B and C* are clearly anomalous when compared to other wilderness lands managed by the National Park Service. The Plan does not even consider alternative management scenarios that are institutionalized at several national parks that include substantial climbing resources. For example, Rocky Mountain National Park programmatically allows fixed anchor placements within wilderness⁵. Joshua Tree National Park (a park with extensive cultural resources that overlap with its climbing resources) has established a wilderness fixed anchor permitting system to allow fixed anchors for new climbing routes that do not impact wilderness resources.⁶ There are also several alternative wilderness climbing management styles practiced on federal lands within a two-hour drive of Lake Mead NRA. Mt. Charleston (USDA Forest Service) recently completed a *Wilderness Management Plan*⁷ that references DO#41, allows existing fixed anchors in wilderness and accepts permits for fixed anchor replacement. Red Rock Canyon National Conservation Area (Bureau of Land Management) is also developing a plan to manage fixed anchors in wilderness. It is within reason that this Plan should propose a range of wilderness climbing management alternatives that reflect the current state of actual wilderness climbing management both regionally and nationwide. For these reasons, there is no indication that Lake Mead NRA is following the guidelines of DO#41 that clearly state "[w]ilderness parks with climbing use will exchange information on best practices, work together on servicewide implementation, and communicate with stakeholders and wilderness users".⁸

The Access Fund recommends an alternative to the Plan's *Alternative B* (preferred alternative) that allows existing fixed anchors to remain in place unless specific and unacceptable impacts to natural and/or cultural resources are identified or well-substantiated impacts to other visitor's wilderness experiences are documented. As stated earlier, we believe that the Plan's assertion that "[w]ilderness climbing education and impact monitoring will be pursued to minimize impacts on wilderness character"⁹ should be the basis for wilderness climbing management at Lake Mead NRA. This type of adaptive climbing management alternative protects wilderness resources, requires assessment of actual

⁴ *Director's Order #12: Conservation Planning, Environmental Impact Analysis and Decision Making, Section 2.7, Overview of the NEPA Process – Alternatives*, National Park Service, US Department of the Interior (1982).

⁵ *Backcountry and Wilderness Management Plan* (2001), Rocky Mountain National Park, National Park Service, Colorado.

⁶ The 2013 Joshua Tree National Park Superintendent's Compendium prohibited the use of vegetation for climbing anchors and subsequently (September, 2013) approved a permit for the placement of a bolted fixed anchor in wilderness in order to protect a Pinyon pine tree previously used as a descent anchor.

⁷ See <http://www.fs.usda.gov/detail/htnf/news-events/?cid=STELPRDB5425209>

⁸ Director's Order #41, Section 7.2

⁹ The Plan at pages 48 and 49.

site conditions, follows the guidelines of the DO#41 and provides the minimum regulatory tool¹⁰ necessary to manage the wilderness.

Cultural resource impacts

The Access Fund supports the protection of cultural resources and Native American heritage, and recognizes that public land managers must balance recreational access with resource protection which sometimes may include restrictions to protect cultural resource values.¹¹ We recognize that climbing and/or fixed anchors may be inappropriate on Tradition Cultural Properties (TCP) such as within the Spirit Mountain Wilderness area. The Access Fund is dedicated to building positive and lasting relationships with Native tribes, and this commitment is evidenced by the establishment of the Access Fund's Native Lands Coordinator position and the promotion of voluntary climbing closures associated with certain sacred sites (e.g., Devils Tower National Monument).

The proposed reduction of fixed anchors, within the Bridge Canyon wilderness area, to protect cultural resources is unsubstantiated and undocumented. The Bridge Canyon wilderness area is not within a TCP and there are no known conflicts between climbing routes, bolted or not, and cultural resource sites within Bridge Canyon wilderness.¹² The Access Fund promotes compliance with wilderness regulations that protect documented cultural resources and honors the cultural importance of sacred sites. However, without an archeological survey or official documentation that a specific site is sacred, there is no federal law that supports the removal of fixed anchors for cultural resource protection.

The Plan allows fixed anchors in the Black Canyon wilderness area. Therefore, without well-substantiated evidence of cultural resources and/or sacred sites, the fixed anchors within Bridge Canyon wilderness should be regarded the same as the fixed anchors in Black Canyon wilderness and "[t]he fixed anchors would be left in place".¹³

Problematic definition of 'bolt-intensive face climb'

The Draft Wilderness Management Plan invokes the guidelines of DO#41 in an attempt to develop standards, related to climbing activities and the use of fixed anchors, associated with the wilderness quality of 'solitude or primitive and unconfined recreation'. Director's Order #41 states that

[t]he establishment of the bolt-intensive face climbs is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support, and the types of levels of impacts associated with such routes.¹⁴

¹⁰ National Wilderness Steering Committee (2006). Guidance White Paper #3, *Minimum Requirements Decision Process*. National Park Service.

¹¹ See Access Fund position on climbing and cultural resources:

http://www.accessfund.org/site/c.tmL5KhNWLrH/b.8009439/k.311E/Climbing_and_Cultural_Resources.htm

¹² Personal communication with Jim Holland on 2/11/2014

¹³ The Plan at page 76.

¹⁴ Director's Order #41, Section 7.2

The Plan states that bolt-intensive face climbs are incompatible with wilderness because of the concentration of human activity that they support and proposes a definition of bolt-intensive face climbs.¹⁵

The Access Fund agrees with the Plan on the point that “[f]ixed anchors should not be placed merely for convenience” and that fixed anchors “must be placed judiciously”.¹⁶ We believe that the prohibition of motorized drills in wilderness creates a self-regulating system that forces rock climbers to deeply consider each bolt placement due to the physical burden and time (~30 minutes to hand drill one hole in dense rock) associated with hand drilling. However, the Plan’s definition that bolt-intensive face climbs “require the placement of more than an ‘occasional’ fixed anchor for protection purposes” and “are climbs that would generally not be climbable without the placement of multiple fixed anchors bolted in a concentrated sequence, from the bottom to the top of a particular climb” is subject to a range of interpretations.¹⁷ This definition is not appropriate for the site-specific geology of Lake Mead NRA, does not reflect a generally accepted understanding of rock climbing practices and does not adhere to the spirit of both DO#41 and the Wilderness Act of 1964. In other words, this definition is a misinterpretation of the DO#41 guidelines that explain that bolt-intensive face climbs can be identified by the human activity they concentrate and managed to mitigate resultant associated impacts.

The Plan’s definition of a bolt-intensive face climb is neither relevant nor applicable at the park unit level because it is based on vague, non-specific language. The Access Fund is concerned that such definition lacks clarity and will allow for a wide range of interpretations and result in disputes for many years to come. For example, the Plan defines a bolt-intensive face climb as one that requires more than an “occasional” fixed anchor, which is elaborated as “multiple fixed anchors in a concentrated sequence, from the bottom to the top” of a climb.¹⁸ The term *multiple* clearly means more than one fixed anchor although the terms *occasional* and *concentrated sequence* are subject to the interpretation of wilderness managers. The Plan attempts to clarify these terms by describing the alternative to a bolt-intensive climb. The Plan describes a “nonintensively [sic] bolted climb” as one that “may include anchors that 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 that will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during the ascent” (bold added for emphasis).¹⁹

According to the Plan, there are two types of climbs that qualify as compatible with wilderness. One is a climb that includes infrequent fixed anchors that connect terrain (cracks) that is protectable by removable protection. The second is a climb that does not follow terrain that affords the opportunity for removable protection, but instead is protected solely (from the bottom to the top) by ‘occasional’ fixed anchors. Therefore, as per the Plan’s definition of a bolt-intensive face climb, we are left to identify a climb as incompatible with wilderness as one that has a “concentrated sequence [of fixed anchors],

¹⁵ The Plan at pages 111 and 112.

¹⁶ Id. at page 111.

¹⁷ Id. at page 112.

¹⁸ Id.

¹⁹ Id.

from the bottom to the top” as opposed to a *non-concentrated sequence* from the bottom to the top, or in other words, occasional fixed anchors. This logic establishes that it is possible to have completely bolted climbs in the wilderness - that are compliant with wilderness standards - as long as the fixed anchors (bolts) are not too concentrated.

The acceptable concentration of fixed anchors has been the source of debate within the climbing community for over fifty years, beginning with intra-climber conflicts over the concentration of fixed anchors on El Capitan (now in designated wilderness) in Yosemite National Park during the 1960s.²⁰ Since then, rock climbers have struggled to define a measure for a generally acceptable concentration of fixed anchors because an absolute answer is unobtainable, but rather site dependent, or more specifically, climbing route dependent.

The joint and fracture pattern of the quartz monzonite rock of Lake Mead NRA does not lend itself to many crack climbs, but instead provides an optimal venue for quintessential, high-adventure wilderness rock climbs on the featureless slabs. Although the slab climbs might be protected from the bottom to the top with fixed anchors, they are not necessarily in a concentrated sequence. The long spaces (measured in body lengths) between the fixed anchors are protected by climbing skill and mental fortitude instead of intermittent crack systems that accept removable protection. Studies indicate that these types of climbs do not attract high concentrations of human activity.²¹ Anecdotal evidence indicates that the climbs located within Bridge Canyon Wilderness have not attracted a high concentration (or amount) of human activity in over thirty years despite being located within 1.5 hours of a major metropolitan area which houses a large climbing community.²²

Perhaps this type of situation is why the language of Director’s Order #41 appropriately avoids a definitive measure for an ‘occasional’ fixed anchor in lieu of defining a bolt-intensive face climb through proxy data that is measurable and directly applicable to the management objective to retain the integrity of the wilderness resource instead of the less meaningful goal to reduce rock climbs.²³ The decision to define a bolt-intensive face climb through proxy data avoids circular ideological arguments and focuses the Director’s Order on the protection of wilderness resources and character.

Suggested revision to the Plan’s definition of ‘bolt-intensive face climb’

The Access Fund requests that the Plan’s definition of a bolt-intensive face climb be replaced with language that only addresses quantifiable and/or recognizable wilderness resource (e.g., natural, cultural, or visitor) impacts, expanding on the actual guidelines of DO#41. We believe that identifying measurable impacts to natural resources, cultural resources or wilderness visitor experience is far more

²⁰ Robbins, R. (1973). *Advanced Rockcraft*. Glendale, CA: La Siesta Press

²¹ Murdock, E.D. (2010). *Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California* (Unpublished). Doctoral Dissertation, University of Arizona.

²² Based on discussion with Lynn Robison (local climber), Jim Holland (LMNRA Management Assistant), Garry Oye (NPS Chief of Wilderness Stewardship) and Greg Jarvis (NPS Program Manager) during site visit on 2/10/2014.

²³ Director’s Order #41, Section 7.2

appropriate for successful wilderness climbing management than attempting to define nebulous concepts such as the appropriate concentration or number of fixed anchors or bolted climbing routes.

The Access Fund agrees with the Plan's general assertion that climbing should be managed to prevent "unacceptable impacts on wilderness resources or character, or interfere significantly with the experience of other park visitors".²⁴ Scientifically defensible resource inventories and visitor-use pattern models are paramount before determining actual site conditions and the relationship between wilderness climbing routes, visitor flow, and resource impacts. Such rigorous studies would identify climbs that attract levels of concentrated human activity, as per DO#41, that exceed the (all user) wilderness group encounter standard and/or result in measurable natural or cultural resource impacts.

It is important to consider that scientifically defensible studies do indicate that fixed anchors are but one of the attributes that attract climbers to a given site and that the distance from a trailhead, climbing route difficulty and climbing route quality are far more important in the destination (climbing route) choice decision making process of a wilderness rock climber.²⁵ It is also useful to recognize that several studies indicate that the vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes thereby avoiding the burden of the careful deliberation and time-consuming labor associated with placing a fixed anchor in wilderness.²⁶ Equally, most climbers favor some form of fixed anchor regulation in wilderness in order to preserve wilderness character.²⁷ The Access Fund is committed to limiting resource impacts and offers continued assistance with developing plans to mitigate climbing-related wilderness impacts.

²⁴ The Plan at page 48.

²⁵ Murdock, E.D. (2010). *Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California* (Unpublished). Doctoral Dissertation, University of Arizona.

²⁶ Studies indicate that the vast minority of climbers (<20% based on site specific samples) have ever placed a bolt. It is reasonable to assume that an even smaller minority of climbers have placed a bolt (hand drilled) in a remote wilderness setting based on documented climber use-patterns.

Schuster, R. M., Thomson, J. G., & Hammitt, W. E. (2001). *Rock Climber's Attitudes Toward Management of Climbing and the Use of Bolts*. *Environmental Management*, 28(3), 403-412.

Reighart, S. (2007). *Rock Climber Perspectives on Management Issues in the Red River Gorge* (Unpublished). Thesis, Ohio State University.

²⁷ The majority of climbers support some level of regulation on fixed anchors in general, especially in designated Wilderness.

Access Fund (2011) *Access Fund NPS Fixed Anchors in Wilderness Survey*, at:

http://www.accessfund.org/site/c.tmL5KhNWLrH/b.6579193/k.6A95/NPS_Fixed_Anchor_Survey.htm

Attarian, A. (1999). *Factors influencing responsible rock climbing behavior* (Unpublished). The American Alpine Club, Golden, CO.

Waldrup, R., & McEwen, D. (1994). *Rockclimbing and Wilderness; A Study of Climber's Attitudes Toward Wilderness, Climbing Impacts and Regulation*. *Trends*, 31(3), 38-49.

Wallace, G. N., & Trench, K. (1996). *A Study of Rock Climbers in Joshua Tree National Park: Implications for the Visitor Experience and Resource Protection (VERP) Management Framework* (Unpublished). Fort Collins, CO: Colorado State University.

Proposed reduction of fixed anchors

Alternatives B and C of the Plan both state that “the concentration of existing bolt-intensive face climbs would be reduced” and that “no new fixed anchors or fixed equipment, with the exception of permitted replacement anchors would be allowed in Bridge Canyon Wilderness”.²⁸ The Access Fund asserts that proposing such policy in Alternatives B and C is pre-decisional and baseless without a complete inventory of natural and cultural resources, an informed understanding of the nature of affected climbing routes and an attempt by Lake Mead NRA to manage wilderness climbing using the minimum regulatory tool. Before any fixed anchors or climbing routes are even considered for removal, it is imperative that Lake Mead NRA conduct the necessary study to determine if there actually are climbing-related impacts to wilderness resources and whether less heavy-handed wilderness management techniques could mitigate any identifiable impacts.

Establishing the minimum amount of regulation that would effectively achieve the desired result for managing an area as wilderness is a fundamental principle for managing visitor activities in wilderness.²⁹ This principle is recognized in wilderness management practices as the “minimum regulatory tool.”³⁰ The Plan states that “[w]ilderness climbing education and impact monitoring will be pursued to minimize impacts on wilderness character”.³¹ These minimum regulatory tools need to be implemented and the results analyzed prior to the implementation of more intrusive wilderness management procedures such as the reduction of fixed anchors.³²

Section 2(c) of the Wilderness Act calls for “outstanding opportunities for solitude or a primitive and unconfined type of recreation”; thus, potential regulation that hinders unconfined recreation, such as a legitimate activity such as wilderness climbing, must be carefully considered and result in the lowest effective level of regulation or enforcement needed to achieve the protection of that wilderness mandate. The proposed reduction of bolt-intensive face climbs in order to increase the wilderness quality of solitude is unequivocally inappropriate given the Plan’s acknowledgment that “only a few climbers are typically present at these areas”³³ and that bolt-intensive face climbs are in-part defined as climbs that support concentrated human activity.³⁴ As such, the Access Fund asserts that the term “the concentration of existing bolt-intensive face climbs would be reduced”³⁵ be removed from the Plan due to Lake Mead NRA’s incomplete and inaccurate assessment of climbing related natural and cultural resource impacts. Due to the Plan’s acknowledgment of no current climbing related impacts to solitude, lack of demonstration of any substantial climbing-related concentrated human activity and lack of consideration of the minimum regulatory tool, the Plan should remove all references to the reduction of fixed anchors as a primary wilderness management tool.

²⁸ The Plan at pages 78 and 94.

²⁹ Hendee, J. C., Stankey, G. H., & Lucas, R. C. (1990). *Wilderness Management*. Golden, CO: North American Press.

³⁰ National Wilderness Steering Committee (2006). Guidance White Paper #3, *Minimum Requirements Decision Process*. National Park Service.

³¹ The Plan at pages 48 and 49.

³² *Id.*

³³ *Id.* at page 206.

³⁴ *Id.* at pages 111 and 112.

³⁵ *Id.* at pages 78 and 94.

Rock climber standards unequal to other wilderness visitors

The Draft Wilderness Management Plan lists Wilderness Monitoring Framework standards that clearly discriminate against wilderness rock climbers when compared to other wilderness visitors. First, the *Monitoring Question* that asks “What are the trends in climbing and how does that affect outstanding opportunities for solitude inside wilderness?” lists the associated *Potential Standard* as “No more than 5 complaints per spring or fall season”.³⁶ No other wilderness visitor group is subjected to this type of standard and it is clearly unfair to use an arbitrary number of complaints – regardless of whether substantiated or not - about one user group in order to initiate a management action. If an arbitrary number (5) of complaints from the public is to be used as a standard, which in itself is discriminatory and belies one of the fundamentals of wilderness management, it should be applied to all wilderness visitor groups.³⁷

Second, the standard for *encounters* with other groups per day at climbing areas (sites) is set to three group encounters in order to retain the characteristic of solitude in the wilderness³⁸, whereas the number of group encounters for other visitors traveling more than one-half mile within the wilderness boundary is set at eight group encounters.³⁹ Any standard for group encounters is completely without merit due to the lack of defensible visitor monitoring data on which to base any site specific group encounter standards for the wilderness areas of Lake Mead NRA. In addition, applying a different encounter-level standard to rock climbers, regardless of the arbitrary and baseless standard itself, is especially discriminatory against a single wilderness visitor group.

The National Park Service recognizes climbing as a “legitimate and appropriate use of wilderness.”⁴⁰ Therefore, there is absolutely no reason why Lake Mead NRA wilderness management should apply different group encounter standards to any appropriate wilderness activity. We request that all discriminatory references be removed from the Plan.

Access Fund Assistance

Please contact us for assistance with wilderness climbing management at Lake Mead NRA. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* has proven to be a useful tool for land managers across the country.⁴¹ The climbing community and the Access Fund are ready, willing, and able to help Lake Mead NRA identify and improve the climbing related trail system, roads, and other climbing-related management needs Lake Mead NRA may require. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program⁴² or assistance from our Conservation Team.⁴³ This team

³⁶ The Plan at page 118.

³⁷ Hendee, J. C., Stankey, G. H., & Lucas, R. C. (1990). *Wilderness Management*. Golden, CO: North American Press.

³⁸ The Plan at page 118.

³⁹ Id. at page 117.

⁴⁰ Director’s Order #41, Section 7.2

⁴¹ See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

⁴² See http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁴³ See http://www.accessfund.org/site/c.tml5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

*

*

*

Thank you for your consideration of wilderness climbing management for Lake Mead NRA. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives and decision makers select alternatives that encourage climbing while sustaining the integrity and character of the wilderness. The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Best Regards,



Erik Murdock
Policy Director
The Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Steven Johnson, Access Fund, Chairman of Policy Committee
Xavier Wasiak, Las Vegas Climbers Liaison Council, President