



Protect America's Climbing

July 13, 2016

BLM Range and Basin National Monument
P.O. Box 237
Caliente, NV
89008

Submitted via Email: blm_nv_basin_range@blm.gov

RE: Public Scoping Comments on Management Plan for Basin and Range National Monument

The Access Fund and Southern Nevada Climbers Coalition (SNCC) appreciate this opportunity to provide comments during the public scoping phase for the Management Plan for Basin and Range National Monument. We applaud the BLM recognizing rock climbing as a viable recreational activity within Basin and Range National Monument¹.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 13,000 members and 100 local affiliates. The Access Fund has an active [MOU with the BLM](#)² and provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

Southern Nevada Climbers Coalition

The Southern Nevada Climber's Coalition (SNCC) is a grassroots affiliate of the Access Fund. The SNCC advocates for rock climbers in Southern Nevada by promoting responsible stewardship of

¹ Recreational Opportunities in Basin and Range National Monument.
http://www.blm.gov/nv/st/en/prog/nlcs_new/Basin_and_Range_National_Monument/recreation_opportunities.html. 2016.

² <https://www.accessfund.org/uploads/AccessFund-BLM-MOU-2015.pdf>

local resources and cultivating greater community awareness and involvement. The SNCC provides an avenue for constructive dialogue between climbers and local land managers, as well as a resource for local and visiting climbers seeking information about the world-class climbing destinations in Southern Nevada. Funding for SNCC projects comes primarily from members and partnering organizations such as the Access Fund, American Alpine Club (AAC) and the American Safe Climbing Association (ASCA). We are fortunate enough to have support from organizations like the American Alpine Institute (AAI), American Mountain Guides Association (AMGA) and many local businesses.

COMMENTS

Access Fund and SNCC request the Management Plan continue to list rock climbing as an approved and appropriate recreational opportunity in the Monument³. We recommend the use of fixed anchors be allowed in rock climbing areas within the Monument. The definition of fixed anchors is climbing equipment (i.e. bolts) left in place to facilitate ascent or descent of technical terrain, in areas critical to the climber's safety. Fixed anchors are typically placed by the first ascensionist where removable anchor placements are not possible or for descents (rappels) that would otherwise be impossible for without a fixed anchor. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes, there for eliminating a wide spread use of fixed anchors in most areas⁴.

Public input is critical for the management of fixed anchors. We encourage the BLM and the climbing community to work collaboratively to manage fixed anchors, exchange information on best practices, and communicate with all stakeholders. The ongoing maintenance of fixed anchors should also be allowed for a quality rock climbing experience⁵. We suggest the

³ Recreational Opportunities in Basin and Range National Monument.

http://www.blm.gov/nv/st/en/prog/nlcs_new/Basin_and_Range_National_Monument/recreation_opportunities.html. 2016.

⁴ 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.

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.

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

⁵ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

Management Plan outline a strategy for allowing fixed anchors. Any administrative action regarding fixed anchors should be well substantiated and give due notice to the public.

We recommend the BLM conduct a full recreational use inventory of the Monument prior to finalizing and implementing a Management Plan. Public access and recreational use patterns should be well documented to ensure adequate protection of resources while allowing sustainable recreation activities such as rock climbing. Basin and Range National Monument contains a wide array of cultural resources and we advocate management strategies that balance appropriate recreation access with resource protection. We request specific areas with cultural resource value within the White River Narrows be identified, so historic rock climbing routes may be opened in areas that do not impact sensitive cultural resources. We recommend all currently open roads and trails remain open to the public so that the public can fully experience the protected objects and values of Basin and Range National Monument.

Rock Climbing in Basin Range National Monument

Currently rock climbing opportunities exist in the Monument and are an approved recreational activity. Sport climbing is the dominant form of climbing requiring the use and maintenance⁶ of fixed anchors for safety. Development of climbing routes has taken place in the Monument area for over thirty years, mostly on the east side of the Golden Gate Range.

Access Fund and SNCC Assistance

The Southern Nevada Climbers Coalition and the Access Fund are ready, willing, and able to help the BLM improve trails or other management needs. Local climbing communities in Nevada have a long history of positive environmental stewardship and collaboration with other organizations to protect rock climbing. Access Fund strives to work with local climbers and land managers to address those needs. We also provide training on planning and stewardship best practices to keep those areas healthy. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program⁷ or assistance from our Conservation Team⁸ which helps maintain climbing areas throughout the United States.

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⁶ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

⁷ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁸ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Thank you for your consideration of these comments for the Range and Basin National Monument Management Plan. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health and integrity of the Monument. The Access Fund looks forward to participating throughout the planning process. Please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the staff to seek input from diverse groups and interests in response to the Management Plan. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,

Katie Goodwin
Public Lands Associate
The Access Fund

Adam Floyd
President
Southern Nevada Climber Coalition



Cc: Brady Robinson, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director