

August 16, 2004

Scott Berkenfield
Supervisory Outdoor Recreation Planner
Monticello Field Office - Bureau of Land Management
PO Box 7
Monticello, Utah, 84534
Email: Scott_Berkenfield@blm.gov

Re: Access Fund Comments to *Draft* Indian Creek Corridor Recreation Plan

Dear Scott:

The Access Fund welcomes the opportunity to provide comments to the Draft Indian Creek Corridor Plan & Environmental Assessment (Draft Plan), and applauds this renewed effort to provide reasonable management direction for the Indian Creek Corridor. We are encouraged by the Bureau of Land Management's (BLM) preferred management direction for Indian Creek, and the self-management provisions of Preferred Alternative B. Subject to the concerns expressed herein, the Access Fund supports Alternative B of Draft Plan.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climbers organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers and mountaineers nationwide. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

A significant number of the Access Fund's members climb at Indian Creek, and we have a proud record of conservation activism in both the Monticello and Moab BLM management areas. To support our commitment to Indian Creek access and conservation the Access Fund has worked in partnership with the Rocky Mountain Field Institute (RMFI), The Nature Conservancy (TNC), and members of the outdoor industry to identify ways that the special resources at Indian Creek can be preserved. Projects that we have supported, and which have been implemented by RMFI, include nearly \$30,000 in Access Fund Conservation Grants for trail and erosion control work throughout the Corridor. In addition the Access Fund assisted TNC's acquisition of Indian Creek's

Dugout Ranch by raising funds and providing additional Conservation Grant funding towards purchase of the property. We continue to work with TNC on climbing-related issues affecting the Dugout Ranch and the Indian Creek Corridor in general.

In 2002 the Access Fund, with the assistance of TNC, BLM and members of the outdoor industry, produced a guide to the area that provides camping, climbing and trail information while promoting a Leave No Trace ethic (see http://www.accessfund.org/programs/programs_news_pr.html). The Access Fund is also spearheading a conservation effort at Indian Creek (called “Save Indian Creek”) that involves various interested parties (the Friends of Indian Creek—“Friends”) who are dedicated towards mitigating recreational impacts at Indian Creek and preserving the special primitive character of the area. The Access Fund has also consistently provided administrative comments to BLM planning initiatives concerning the Indian Creek area, and has worked diligently with other interested parties to identify reasonable and effective management strategies for the region.

I. INDIAN CREEK

As you know, the Indian Creek Corridor is renown as one the world’s most outstanding rock climbing areas. Climbers are drawn to the region’s unique combination of scenic beauty, remarkable landscape, perfectly fractured crack systems, diversity and concentration of climbing routes, and high-quality compact sandstone. Climbers have been visiting the area since the 1960s. The tower formations and the many parallel-sided crack systems on the canyon walls provide classic climbs such as “Supercrack,” “Coyne Crack” and “The Incredible Hand Crack”—among thousands of others.

The visual quality and aesthetics of Indian Creek contribute to the deep personal attachment that many people have for the area. The most common comment made by people interested in the future of Indian Creek is the hope that it remains as primitive and unchanged as possible. However, most also agree that with current and/or increased use patterns some management initiatives must be implemented to mitigate existing or potential negative recreational impacts. Accordingly, we believe that the BLM should select a management direction that maintains the primitive character of Indian Creek while preserving its outstanding visual and aesthetic qualities.

The Access Fund recognizes that recreational access at Indian Creek must be balanced with proper management (which may include restrictions) to protect the integrity of the landscape. However, it is important to note that Indian Creek contains some of the most unique, popular, and challenging technical climbing opportunities in the world. The Access Fund is concerned with the preservation of these opportunities and believes the

BLM should keep in mind the world-class climbing opportunities at Indian Creek when selecting its management alternative and implementing that decision. There is no other climbing area in the world like Indian Creek and this recreational value should be emphasized in any management initiative that is established for Indian Creek.

II. GENERAL COMMENTS

Purpose and Need for BLM Management at Indian Creek

The BLM proposes to prepare and implement a plan to manage certain resources and uses in the Indian Creek Corridor in conformance with the San Juan Resource Management Plan (RMP). In so doing, the BLM seeks to “protect natural resources, protect cultural resources, and provide for a variety of safe visitor services to campers, climbers, and other user groups.” Although, the Access Fund supports the BLM’s stated purpose and need for an Indian Creek management plan, “safe visitor services” may better be articulated as “opportunities” so that “services” are not provided through the development of unnecessary and potentially obtrusive facilities. Most users want recreational opportunities, not “safe visitor services.” As noted above, preserving Indian Creek’s primitive character and world-class recreation should be woven into the purpose of the Indian Creek plan

Most agree that Indian Creek has experienced a significant increase in visitation over the last ten years in particular. Accompanying this use are concerns of associated recreational impacts to natural and cultural resources, both current and in the future. For example, soils and vegetation are being lost in the lower Indian Creek area as a result of unrestricted camping and OHV use, and cultural sites have been damaged. The Access Fund agrees that these management challenges need to be addressed if the natural and cultural resources of the planning area are to be maintained, and if the current recreational experiences is to be retained. Because Indian Creek is so special, the BLM must take whatever measures are necessary to avoid altering the natural environment, especially when considering management measures that may require the installation of facilities to address human impacts.

Rock Climbing

Under all alternatives in the Draft Plan, climbing in the Indian Creek Corridor would continue to remain open to the public and the establishment of new routes and the placing of bolts and anchors would remain permitted. As always, the Draft Plan encourages climbers to limit their impact when placing anchors, and alteration of the rock by gluing, chipping, chiseling or gardening would not be allowed. The Access Fund acknowledges

that federal law requires the BLM to prevent the destruction of the natural environment and protect cultural resources and special status flora and fauna. All alternatives under the Draft Plan use existing legal authority to prohibit climbing on routes that may impact cultural resources. Accordingly, the BLM should adequately alert climbers to any restrictions related to cultural resource conflicts, and the Draft Plan should specify the specific routes to be closed, why, and the exact method the BLM will use to post routes as closed (similar postings elsewhere on federal land have resulted in ugly chain link fence barriers that should be disfavored at Indian Creek). Similarly, the BLM also intends to seasonally close and post climbing routes that may adversely impact nesting raptors. Likewise, the Draft Plan should indicate which routes the BLM will close to protect nesting birds, whether there will be a monitoring program, and the intended spatial and temporal scope of any closures.

The Access Fund supports the reasonable protection of sensitive cultural and natural resources that may come in conflict with recreational activity, and will work with the BLM to reach out to climbers and inform them of the sensitive nature of these resources and how to avoid negatively impacting them. Because these rock climbing prescriptions related to cultural resources and special status flora and fauna pre-date the current management initiative, the focus of the Draft Plan is properly directed to camping, hiking, and transportation issues.

Alternatives Considered but Eliminated

The Access Fund supports the BLM's decision to avoid unnecessary and unreasonable management restrictions. A few suggested initiatives rejected by the BLM relate to blanket fees, and the closing of all dispersed camping. The Access Fund agrees with the BLM that implementing a tollbooth type entrance station along Highway 211 at Newspaper Rock is unnecessary because there is no demonstrated need to charge all visitors to Indian Creek to protect or provide services to the management area. Likewise, closing the Indian Creek Corridor to undesignated dispersed camping in response to problems associated with human waste disposal is unneeded because campers at Indian Creek can adequately address their sanitation impacts. In sum, the Access Fund believes that blanket fees and the closing of dispersed campsites do not serve the purpose and need of the current management initiative and thus have been properly eliminated from the Draft Plan.

III. SPECIFIC COMMENTS

The discussion among the user community regarding whether or not Indian Creek needs *any* increased BLM management is hotly debated. Many feel that there is no problem at

all at Indian Creek in terms of natural resource impacts, while others see the slippery slope of increased environmental degradation caused by over-use in a fragile area. However, even for those that would like no action at Indian Creek, the BLM's No Action Alternative A is a bad management choice for a variety of reasons, while the Preferred Alternative B provides both reasonably limited intervention by the BLM to address recreational impacts while still providing a vision for the future in terms of managing this unique area. Regardless of which alternative the BLM selects for managing the Indian Creek Corridor, the BLM should determine the actual annual user days for the management area. Only after a clear identification of use patterns at Indian Creek can the BLM effectively and reasonably impose limitations that adequately protect the area while maintaining recreation opportunities.

Alternative A requires the BLM to react to management problems and gives them absolute decision making over management solutions to future problems. Significantly, Alternative A provides no foresight if visitation were to continue to increase. Conversely, while Alternative B does have a few restrictions on camping practices, it enables the user community to control the level of BLM management at Indian Creek by allowing users to self-manage their conduct. Alternative B also provides a vision for the future that addresses current and/or possible future impacts while seeking to limit facility developments and management intervention by the BLM.

Alternative B is not perfect, especially in terms of the BLM's potential undue reliance on the private sector to fund its current management obligations. Still, in drafting Alternative B it is clear that the BLM has taken great pains to consider public preferences when outlining its preferred management alternative. This consideration should serve as a model for all public land managers that must balance human conduct with cultural and natural resource protection.

The comments provided below demonstrate why Alternative A would provide poor direction for Indian Creek's future, whereas Alternative B represents the best alternative in the Draft Plan for managing recreation at Indian Creek.

A. ALTERNATIVE A: NO ACTION

The most significant problem with Alternative A—the No Action Alternative—is that it would likely result in an overall gradual decline in the quality and health of natural resources in the Indian Creek Corridor. Moreover, Alternative A offers no plan for future management of Indian Creek if user impacts were to occur and/or increase. There would be no change to the location, designation, or establishment of campsites despite the ongoing creep of new campsites—and associated vegetative loss—throughout the

Corridor. If no action is taken camping impacts to vegetative cover would expand, water quality in the corridor could continue to decline gradually, and Indian Creek would likely remain on the state's Impaired Waters List.

Under Alternative A there would be no plan for developing trails despite the spider-web of user-built paths leading to many popular cliffs. No new restroom facilities would be considered although human waste has been recognized by the BLM as a primary "trigger issue" that could bring developments and fees to the area. No parking areas would be established although the BLM recognizes the significant safety hazard at Donnelly Canyon during peak season and the fact that autos gradually expand parking locations throughout the Corridor. Because Alternative A offers no overall management vision or specific management direction, it is likely that there would be no improvement or stability related to water quality, soil erosion, vegetative cover, wildlife, riparian areas, scenic quality, or cultural resources.

Many frequent users of the area agree that the existing situation cannot continue forever without damaging the natural and cultural resources of the Corridor. If the BLM were to choose a No Action alternative, and current use levels continued, at some point conditions would require changes to the management of the area that would prevent further loss and damage to natural and cultural resources. These changes would most likely involve the two things Indian Creek enthusiasts fear most: the charging of fees and the development of facilities to manage human waste and other associated camping impacts. As stated in the Draft Plan, "By choosing the No Action Alternative those changes are just put off until a later time." Moreover, by taking no action now, those changes (developments, fees) are more likely to occur in the future.

Camping

Dispersed camping is prevalent throughout the Corridor, and as the popularity of Indian Creek grows these dispersed camping areas continue to expand into previously undisturbed areas. Vegetation is being lost to campsite "creep", social trails, and creation of additional undeveloped campsites. Alternative A would do nothing to address this ongoing problem.

Moreover, under Alternative A, Indian Creek would continue under the current management provisions outlined in the RMP, including the order prohibiting dispersed camping. The BLM has not enforced the 1997 closure notice prohibiting dispersed and undesignated camping because it lacks the necessary staffing resources. Therefore, under the No Action Alternative A, many of the treasured dispersed camping sites within the Corridor could be closed if and when the BLM obtains the resources to enforce the

closure order. If Alternative A is selected and the BLM does act to enforce the order prohibiting dispersed camping, the only permitted camping at Indian Creek will be at Newspaper Rock, Hamburger Rock, and Indian Creek Falls. However, these campgrounds would not be further developed, and no new camping areas would be designated unless eventually addressed in RMP revisions. Therefore, the total number of permitted campsites under Alternative A could be severely restricted in number and location. This undesirable scenario would forever change the experience of Indian Creek regulars because their favorite camping areas could be closed.

Sanitation and Fees

As stated in the Draft Plan, “Fees would be charged according to the level of service and facilities provided” including, presumably, facilities built to address acknowledged human waste issues at Indian Creek. Under Alternative A the restrooms at Newspaper Rock, Hamburger Rock, and Indian Creek Falls would continue to be the only permanent restrooms within the Corridor. These facilities would be maintained as they are currently, no improvements would be made to them, and neither current, nor future, demands for restrooms and sanitation would be met. Thus, under Alternative A, nearly all the human waste produced by the thousands of user days at Indian Creek would be buried in “cat holes.” If Indian Creek water quality samples were tested and found to fail Clean Water Act standards—and the BLM was taking No Action—then the BLM may be forced through lawsuits or otherwise to aggressively develop costly human waste facilities at Indian Creek to address these water quality issues. In sum, the management inaction of Alternative A would most likely eventually lead to restroom developments and fees, negatively changing Indian Creek’s primitive environment permanently.

Although No Action may sound good to frequent visitors that want Indian Creek to remain as unchanged as possible, the effects of the No Action Alternative A would likely cause more change at Indian Creek because the BLM would be forced to react to recreation impacts and human waste issues caused, in effect, by management inaction. Moreover, the No Action Alternative A keeps in place management authority to close all dispersed camping throughout the Corridor. Perhaps most significant, Alternative A provides no vision for preserving the primitive character of Indian Creek, which is deserving of such a world-class natural and recreational resource.

B. PREFERRED ALTERNATIVE B

The better approach for managing the Indian Creek Corridor is outlined the Draft Plan’s Preferred Alternative B. This management direction offers a vision for maintaining the special character of the Indian Creek environment while limiting unnecessary

management intervention by the BLM. Alternative B would result in an overall improvement of the quality of recreational resources in the Corridor and retain the outstanding primitive camping resources found throughout the region.

The Preferred Alternative B would change the environment at Indian Creek. Site plans would be developed for designated campgrounds at Bridger Jack and Creek Pasture (designating camping at these areas would change the feel of camping where currently camping is dispersed and completely unregulated), some key parking areas would be built and few trails would gradually be constructed, and the Donnelly Canyon area would get parking, trails and a restroom. Camping at Newspaper Rock would be eliminated and a new campground built at Shay Mountain Vista. Changes in user conduct would also be significant in terms of addressing human waste disposal issues. Many of these changes would be controversial and not all users will support them.

However, Alternative B would stabilize vegetative cover within the Corridor with the designation of campsites, parking areas, and access trails, and have a positive impact on cultural resources by removing climbing routes that conflict with rock art. Preferred Alternative B may also improve water quality by providing a plan for human waste disposal and decreasing recreational use in riparian zones, which, in turn, may also help remove Indian Creek from the state's Impaired Waters List. Significantly, Alternative B would provide for incremental management intervention to address potential recreational impacts at Indian Creek, and an opportunity for the user community to regulate itself.

Camping

Under Alternative B the current closure notice for dispersed camping would be lifted, and undesignated dispersed camping within the Indian Creek Corridor would be allowed as outlined in the existing San Juan RMP, allowing people to continue using their favorite campsites. The Access Fund supports the closure of dispersed camping areas (through RMP revisions) only if these sites (1) must be accessed by crossing private land, or (2) conflict with cultural and or special status flora/fauna. The Access Fund also supports the restriction in Alternative B that limits campfires to fire rings in designated camping areas, and encouraging "Leave No Trace" standards where fire rings are not available in dispersed camping areas. Likewise, we also support prohibiting wood collection for fires throughout the entire Indian Creek Corridor.

Although Alternative B would increase the BLM's management presence in order to decrease recreation related impacts to sensitive resources, these changes are small when compared to the new restrictions that could be forced upon the public under the No Action Alternative A. The Access Fund supports the designation of specific camping

areas while still allowing undesignated dispersed camping opportunities to allow for a variety of camping experiences. By limiting camping to established sites (in both designated and dispersed camping areas), impacts would be minimized and contained thus preventing the creep of campsites and associated parking areas. Controlling campsite expansion would also allow some previously impacted areas to rehabilitate, decreasing invasive species and social trailings.

Under Alternative B the Bridger Jack Mesa and Creek Pasture dispersed camping areas would be designated and developed according to site plans. Changes to these areas may include the installation of fire rings, educational kiosks or signs, delineated parking areas, campsite marker posts, and toilets. The Draft Plan states that no fees would be charged for use of this area unless it is determined that restrooms are needed. “At that point, options for covering the cost of installation and maintenance of restrooms would be explored.” The Access Fund supports designating these popular areas for camping to protect ongoing and potential damage to vegetation. However, we urge the BLM to avoid designating additional camping (as camping demand increases) located around the backside of Bridger Jack Mesa (in Lavender Canyon) as this area is currently relatively undisturbed. Furthermore, Dugout Ranch resident Heidi Redd has long requested this area remain undisturbed and off limits to camping. This is a reasonable request from someone that has given much to the user community at Indian Creek.

Under Alternative B, camping in the Cottonwoods Camp and Super bowl areas would remain dispersed, “but not encouraged.” Because no facilities or services would be implemented in these areas, no fees would be charged. The Access Fund supports retaining most of the dispersed camping throughout the Indian Creek Corridor as it is this unique camping experience that draws so many people to the region. The significant change to the Cottonwoods Camp and Super bowl areas, as with all dispersed sites, involves user conduct. At all camping areas (except Shay Mountain and Hamburger Rock), a one-year trial pack-in/pack-out policy would be enforced for all sanitation and garbage. The Draft Plan states that “If at the end of the trial period, this policy is not found to be effective, a recommendation would be made to the RMP to close this area to dispersed camping.” Subject to the points noted below, the Access Fund supports the trial pack-in/pack-out policy for human waste and garbage so long as the trial period is effectively established to succeed. As such, the BLM should not institute excessively strict standards for the trial period; the policy should be designed for success, not failure.

Sanitation and Garbage

Under Alternative B a one-year trial period pack-in/pack-out policy would be enforced for all areas without restrooms and garbage receptacles (that is, all camping except

Hamburger Rock and Shay Mountain Vista campgrounds). If problems with human waste persist or increase, portable toilets would be required or restrooms would be installed in these areas, and “fees would be charged to cover the costs of construction and maintenance of the restrooms.” The following standards for the pack in/pack out policy would be applied and enforced during the trial period: adherence to Leave No Trace standards, campers must use a bag system or portable toilet for their own human waste, using cat holes for human waste is prohibited as is leaving or burying toilet paper, all campers must pack out all trash and garbage, and screening or filtering of grey water is required before dumping.

In Alternative B the BLM identified the following benchmarks and monitoring measures that would be used to determine the level of compliance and effectiveness of the pack-in/pack-out policy:

- Regular BLM site visits to educate the public and enforce the pack-in/pack-out policy.
- The pack-in/pack-out policy would be determined to be working if regular inspections find that (1) people have toilets or bags, and seem to be using them; (2) toilet paper and/or evidence of human waste is not found in camping areas; and (3) used toilet bags are not found in the area.

Alternative B provides that the pack-in/pack-out policy would remain in place as long as the public thinks that it is working, and the BLM thinks that it is working. The Access Fund agrees that it is crucial to involve the public in deciding whether the policy is working. However, there should be much more specificity in the Draft Plan for standards that indicate compliance or noncompliance with the new policy. By clearly stating the criteria for success/failure of the policy up front there will be less chance of confusion and disagreement later regarding the effectiveness of the policy.

The Access Fund supports the management direction in Alternative B for human waste disposal because it allows users to manage themselves and does not require unnecessary developments and/or fees to pay for restrooms. However, for this trial period to be more than an interesting exercise, the BLM must ensure that:

1. The public is educated about the policy;
2. Inspections and monitoring are reasonable, especially during the first year;
3. It is easy for campers to access bags used for human waste;
4. If there is to be a change in management (i.e., installation of toilets and/or fees) that the public be given notice and a grace period to clean up its act and/or suggest alternate measures to ensure compliance with the policy;

5. At the six-month point of the trial period the policy should be assessed, and appropriate changes made, as to effectiveness and compliance (the BLM should also consider extending the trial period to two years to give the policy a realistic chance for success); and
6. At the end of the trial period, the BLM should review the policy and monitoring methods to make it more effective. Potential changes to the policy itself—or how it is implemented—may increase compliance more than the threat of imposing fees.

Alternative B states that if at any time in the future the BLM determines that the pack-in/pack-out policy is no longer effective, permanent restrooms would be installed and fees would be charged to cover the costs of construction and maintenance of the restrooms. The BLM should provide for incremental steps in this decision-making process and consider extending the trial period to two years. The BLM should schedule a review of the policy after the first peak season (Fall 2004), after which an assessment could be made as to compliance and any systematic problems with the policy. At that time the BLM (along with RMFI, TNC and the Friends of Indian Creek) could work to identify reasonable adjustments to the policy so to ensure improved effectiveness. Likewise, at the end of the one-year trial period, the BLM should again review compliance and effectiveness of the policy to make any necessary adjustments. Making the trial period longer (from one to two years) would make the policy more likely to succeed because there would be more time for users to become informed of the policy and to get more accustomed to packing out their own waste. Moreover, in the big picture, a two-year trial will not measurably harm the resource any more than a one-year trial, especially considering that there has been absolutely no human waste policy for the Corridor until this Draft Plan. Interested parties such as the Friends group are essential in adequately assessing such compliance and how to improve the effectiveness of the pack in/pack out policy.

As noted above, the Access Fund, other interested organizations, and members of the outdoor community have formed the Friends of Indian Creek group that is committed, in part, to assisting the BLM in educating the public on the pack-in/pack-out policy. The various Friends of Indian Creek entities are well situated to reach Indian Creek's user community to get the word out and help encourage compliance with the pack in/pack out policy. The various publications and networks of the Friends group are an excellent way to inform Indian Creek users of the new policy, how it works, and where to buy "wag bags" or other personal disposal systems, and what the consequences are for noncompliance. The Friends group may also be able to assist the BLM in funding human waste management needs such as subsidizing wag bags, and assist the BLM in monitoring the condition of the Indian Creek area during the trial pack in/pack out period.

In sum, the Access Fund agrees with the statement in Alternative B that implementing a trial pack-in/pack-out policy for human waste would have a positive effect on the natural environment at Indian Creek and would ultimately provide for a healthier visitor experience and less on-the-ground management by the BLM. However, the determination that the policy is no longer working (and therefore restrooms with fees should be installed) should be done incrementally with the involvement of the Friends group. The BLM should implement a ½-year review to identify interim compliance/effectiveness of the policy and how to determine ways to improve the policy. The specific criteria for determining effectiveness should be clearly stated in the Draft Plan, and the BLM should consider extending the trial period from one to two years to better allow for outreach/education to the user community regarding the policy.

Trails and Parking

Trails are controversial at Indian Creek. Many frequent and long-time users feel that trails only increase use and ultimately cause more harm than good. Others believe that trails are a necessary evil as the people are going to come regardless of the existence of trails and there needs to be a good way to direct hikers over the fragile desert terrain. Finally, there is the group who feels that trails add to the enjoyment and protection of the area and should be built anywhere people travel. Public comments to the BLM reveal that many if not most users feel that designating and building access trails would benefit the area. The benefits of trail development may include the reduction of impacts to vegetation and cryptobiotic soil, and the protection of wildlife habitat, cultural resources and water resources.

The Access Fund agrees with the statement in Alternative B that by designating hiking trails and access trails for climbers, the BLM can reroute trails that conflict with other resources, maintain trails at a level of development required for sustained use, and limit or stop trail proliferation. Moreover, designating access trails would have a negligible adverse impact on Corridor users and may contribute to the safety and ease of the climbers reaching their objectives. We believe that most users are respectful of the need to protect Indian Creek's various resources and would be willing to use designated trails and allow closed trails to be rehabilitated.

The BLM should, however, develop trails only as needed after evaluating the specific benefits and/or protection provided by each trail. Moreover, many who recreate at Indian Creek enjoy the primitive nature of the area and do not want large trail signs and overbuilt "superhighways" to reach their cliffs. In each trail project the BLM should strive to use only natural materials that blend-in with the desert environment. The Access

Fund agrees with the statement in the Draft Plan that all new developments throughout the Corridor (whether they are restrooms, trails, or other facility developments) should employ “design components to mitigate visual impacts, taking into consideration color, texture, height, orientation, and materials.”

The Access Fund also supports the plan in Alternative B for limited parking areas through the Corridor that are minimal in size and which alter the environment only so much as to provide a demonstrated need for parking space. We agree that providing designated parking at trailheads and climbing access routes allows for concentrating impacts to a specific site rather than dispersed impacts over a greater area. Designated parking locations also allow for information and educational materials to be placed where users would see them.

Donnelley Canyon

The Access Fund supports the BLM’s Site Plan in Alternative B for the Donnelley Canyon area. This area should remain free of charge to the user community. The core Supercrack/Battle of the Bulge area is the focal point of much Indian Creek climbing and the public would be well-served by investing in protective infrastructure here such as parking, trails and a restroom. Under Alternative B the BLM would provide adequate parking and restroom facilities for the Donnelley Canyon area once land-ownership boundaries have been determined. Donnelley Canyon is also the ideal location for the installation of educational kiosks or signs, and the establishment of recreational access trails to Supercrack and Battle of the Bulge buttresses. The BLM should, however, create an annual budget line to fund the maintenance of the restroom at Donnelley Canyon rather than rely on outside sources (see Fees below).

Education and Outreach

Under Alternative B, the BLM would expand education and outreach efforts in the Corridor. Information kiosks, signs, and brochures would provide the public with information which may include: Leave No Trace practices, protection of cultural and natural resources, OHV etiquette, camping etiquette, climbing etiquette, respect for private and public property, control of invasive and noxious weeds, dog etiquette, fire safety, purpose and use of user fees (if any), and human waste disposal. If Alternative B is to succeed, the BLM must focus its educational message on proper human waste disposal practices. The Access Fund supports the BLM’s expanded efforts to provide education and outreach to the user community regarding sensitive resources and management practices at Indian Creek. For Alternative B to succeed the BLM must be aggressive, consistent and effective in informing the public regarding the pack in/pack

out policy. As noted above, the Friends of Indian Creek may provide crucial assistance to the BLM in this effort.

Under Alternative B the BLM would distribute educational materials at various locations such as the Newspaper Rock picnic area, parking areas, designated campgrounds, the San Juan County Visitors Center, Canyonlands National Park Visitor Center, along Highway 211, and the Monticello and Moab BLM Field Offices. The BLM should also provide this information to the Friends group—especially members of the outdoor industry—as well as to local climbing shops in Moab, Telluride, and Durango. The Access Fund may also be able to reprint the information guide it published in 2002 and distribute that guide throughout climbing communities in the western United States. Again, the success of the pack in/pack out policy may well balance on the effectiveness of the BLM’s public education and outreach efforts.

Fees

To many of the frequent visitors to Indian Creek, fees are the crux management issue. Many people do not object to the nominal fee that is often charged at public land recreation areas (although in some cases there are good reasons to object to such fees in principle), most Indian Creek visitors fear the developments that come with fees more than the financial cost. Once fees are established, then the facilities that justify the fees must be built—examples of this phenomenon are abundant across the country. Under Alternative B, fees would be charged according to the level of service provided at each site, but no fees would be charged for use of any area as long as the pack-in/pack-out policy remains in place. If at any point the BLM feels that the pack-in/pack-out policy is no longer working, fees would be charged to cover the costs of toilet facilities.

The Access Fund enthusiastically supports the BLM’s efforts to keep Indian Creek free of charge because keeping Indian Creek free is the best way to ensure that the primitive character of the region is retained. Once fees are charged it is only a matter of time before the area is fundamentally changed forever. Moreover, Indian Creek may be the last climbing area of its size and quality that remains free from fees and associated developments, and this unique management environment is well worth preserving. Indeed, it is this kind of “hands off” management that attracts many to Indian Creek. The Access Fund and Friends group are committed to assisting the BLM in keeping the Corridor as unchanged as possible. Accordingly, the Access Fund is concerned by the “triggers” in the Draft Plan (both alternatives) that could bring fees and associated developments to the area.

In the Draft Plan, the BLM should provide a cost estimate for the implementation for Preferred Alternative B, and how these implementation costs will be funded. As noted above, the various members of the Friends group may be willing to assist the BLM in the cost of implementing Alternative B, including grants for trail projects, helping to sponsor wag bags to maximize compliance with the pack in/pack out policy, and/or provide some funding for toilet maintenance. Toilet maintenance should be the responsibility of the BLM, and they should not be installed if the BLM intends other funds to permanently support their maintenance costs. However, if the Friends group or other source can provide “seed” money (rather than an annual money stream) to provide initial maintenance support, then these toilets are likely the best way to ensure that locations like the Bridger Jack camping area are free from human waste problems.

There has been discussion about establishing a dedicated Indian Creek “donation fund” at the Monticello BLM office that individuals and entities could donate to in support of Indian Creek stewardship. This fund could provide the BLM much-needed support for critical stewardship efforts at Indian Creek, and even be a reserve fund for hold developments and fees at bay. Again, it is critical, however, that the BLM not become significantly reliant on the private sector to pay for its pre-existing obligation to manage public lands. While there may be financial support from the private sector, the BLM must establish a budget line for every aspect of the Indian Creek Plan and be aggressive in seeking federal appropriations to pay for these costs, whether initial capital expenses or annual maintenance costs. The BLM should also look to the Friends group to help it lobby the Utah BLM office and the Washington, DC BLM (and federal appropriators) for increased recreation management funds for Utah in general and Indian Creek in particular. While outreach and limited financial support by the Friends group may be crucial for ensuring the success of the pack in/pack out policy, increasing the annual recreation budget for the Monticello BLM office is a better way to permanently protect Indian Creek’s natural environment and pristine undeveloped character.

* * *

The Access Fund endorses Alternative B of the Draft Plan, subject to the issues highlighted in these comments. Alternative B is an excellent chance for climbers and other users of Indian Creek to self-manage themselves and thus avoid the developments and fees that would forever change the special character of the region. The BLM should be commended for its efforts in the Draft Plan to consider public preferences while ensuring the protection of Indian Creek’s many valuable resources.

While the Access Fund supports the selection of Alternative B as the best direction for managing the uses and resources at Indian Creek, we believe that the BLM should

reassess following issues: (1) clarifying the process and criteria through which compliance with the pack in/pack out policy is determined; (2) consideration of both a six-month review of the policy and extending the trial period to two years; and (3) the use of the Friends of Indian Creek as a crucial resource for informing the user community of the new pack in/pack out policy and for funding some of the human waste management issues faced by the BLM. Importantly, we believe that the BLM should aggressively seek permanent funding through federal appropriations for human waste maintenance costs rather than using the private sector as a permanent crutch for funding. A few adjustments to how Alternative B might be implemented—and paid for—will go a long way towards setting the pack in/pack out policy up for success rather than failure.

I hope the above information helps the BLM identify the appropriate scope for the Indian Creek Plan, and clarifies ways in which the Access Fund and Friends of Indian Creek can be of assistance. Please do not hesitate to contact me if you would like to discuss any of the points covered in this comment letter. The Access Fund looks forward to working with the BLM and any interested parties throughout the planning process for Indian Creek. The world-class quality and increasing popularity of this sensitive area underscores the need for a reasonable plan to manage recreation at Indian Creek. I look forward to working with you to protect the many special resources at Indian Creek, and to keep the climbing and camping experiences as unchanged as possible.

Regards,

Jason Keith
Policy Director
The Access Fund

Cc: Steve Matous, Executive Director, The Access Fund
Access Fund Policy Committee
Scott Berkenfield, Outdoor Recreation Planner, BLM
Sue Bellagamba, Canyonlands Program Director, The Nature Conservancy
Heidi Redd, Dugout Ranch
Mark Hesse, Director, Rocky Mountain Field Institute
Friends of Indian Creek
The Outdoor Industry

**The Undersigned Support the Statements Herein
and the Selection of the Preferred Alternative B for the
Indian Creek Corridor Plan and Environmental Assessment**

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization

Signature

Print name & company/organization