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Bears Ears National Monument Planning Effort  
P.O. Box 7  
Monticello, Utah 84535  
Email: blm\_ut\_monument\_monuments@blm.gov

**RE: American Mountain Guides Association Comments on Management Plans for the Indian Creek and Shash Jáa Units of Bears Ears National Monument**

Dear BLM Planners,

The American Mountain Guides Association respectfully submits these comments on the Management Plans for the Indian Creek and Shash Jáa Units of Bears Ears National Monument.

**American Mountain Guides Association**

The American Mountain Guides Association (AMGA) represents the interests of the American mountain guiding community which includes climbing and skiing guides who provide environmentally responsible, educational, and safety-oriented outdoor recreation experiences for the public on public lands. As the American representative to the International Federation of Mountain Guide Associations, the AMGA institutes international standards for the mountain guiding profession in the United States and serves as an educational body for land management agencies, guide services, outdoor clubs, and others wishing to establish recognized standards for guided climbing and skiing activities. The educational branch of the AMGA has trained over 13,000 climbing instructors, skiing guides, and mountain guides across the nation. Of additional relevance to this discussion, our membership includes outfitters and guides who have been operating on public lands since the inception of the modern commercial recreation permitting system. We have extensive experience with public land management systems, philosophies, and permitting, and we appreciate the opportunity to share our comments on the Management Plans for the Indian Creek and Shash Jáa Units of Bears Ears National Monument.

We support the goal of the management plan for the Indian Creek Unit to collaborate with American Indian Tribes to educate Special Recreation Permit (SRP) holders about the cultural history of the Monument, backcountry site visitor etiquette, and stewardship, and to train SRP holders in site monitoring techniques and conducting monitoring inspections. We also support the language in Alternative D that directs the agencies to work with climbing organizations and SRP holders to increase volunteer monitoring and educate visitors.

## **Guided Climbing at Indian Creek**

Many AMGA certified guides are authorized under Special Recreation Permits (SRPs) to provide guided climbing activities on BLM managed lands within the Indian Creek unit of Bears Ears National Monument (BENM). Indian Creek is a world-renowned rock climbing destination and the BLM Monticello Field Office commonly issues more SRPs for commercially guided rock climbing than any other activity. There are currently 22 SRP holders serving typically 100 to 300 visitors annually at 14 climbing walls within the Indian Creek Unit. Authorized locations for climbing SRPs at Indian Creek include Battle of the Bulge, Donnelly Canyon, Supercrack Buttress, Blue Gramma, Reservoir Wall, Cat Wall, Scarface Wall, Six Star Wall, Selfish Wall, 4x4 Wall, Rambo Walls, Optimator Wall, North Six Shooter, and Pistol Whipped. These climbing areas offer the guided public an opportunity to experience the world-class climbing opportunities found only at Indian Creek. Accordingly, the AMGA and our network of certified guides and accredited guide services have a strong interest in appropriate and effective management of BENM.

## **Management Direction as it Pertains to Commercial Uses**

The AMGA recognizes the importance of adjusting climbing use to ensure the preservation of sensitive cultural and historical features. To this end, we support the direction in the Indian Creek management plan, which states “[if a] survey indicates the potential for impacts to significant paleontological resources, the climbing route would be altered to avoid or minimize impacts.” However, other provisions in the Indian Creek management plan require additional clarification. Specifically, the provisions in Alternative D which require a “paleontological survey and clearance prior to issuance of the permit” need further explanation. Does this requirement pertain to new permits, existing permits, or both? As written, it appears to necessitate a new survey, perhaps of already authorized climbing sites, before existing permit holders could continue commercial activities at Indian Creek. We believe the paleontological survey requirement should pertain only to new permits that would be issued for guided climbing locations not yet surveyed. The 14 currently authorized SRP locations which have already been cleared for paleontological and cultural resources should not be subject to this requirement. We would like the BLM to clarify this survey requirement to improve understanding for all involved.

## **Support for Additional Management Plan Provisions**

The AMGA supports the following management direction for the Indian Creek Unit of Bears Ears National Monument:

- The AMGA supports planning for the development of “**hiking paths and trails** if consistent with maintaining [BENM] objects and values.” As part of the site-specific implementation-level travel planning process, redundant hiking trails and social trails would be closed and reclaimed. BLM should develop a comprehensive plan for the Indian Creek corridor as part of this travel plan to address existing and future climbing use patterns. This plan should document existing and future needs for trails, roads, parking areas, and trailheads.

- The AMGA supports the proposed implementation-level **camping plan** to assess camping needs and associated issues such as toilets and waste.
- The AMGA supports the **Visual Resource Management I** (VRM) direction found in Alternative B that “preserve[s] the existing character of the landscape.” VRM I provides for natural ecological changes and does not prevent limited management developments so long as changes to the “characteristic landscape” remain very low. AMGA supports this strong VRM standard in order to protect Indian’s Creek’s world-class viewshed important to our members and the guided public. Any new VRM prescriptions should allow for the maintenance of existing campgrounds and trails and any foreseeable needs based on projected use levels.
- The AMGA supports the provisions in Alternative C whereby all climbing routes, trails, and access points remain open but are monitored for impacts to **cultural resources**. If such impacts are observed, the agencies would work to educate users and encourage self-regulation to minimize impacts. The AMGA supports this agency approach to working proactively with the climbing community to address and avoid conflicts and thus limit climbing closures.

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The AMGA appreciates the opportunity to comment on this important management plan for Bears Ears National Monument. Please let me know if you have questions. I can be reached at [matt@amga.com](mailto:matt@amga.com).

Sincerely,



Matt Wade  
Advocacy & Policy Director  
American Mountain Guides Association