



Colorado Parks and Wildlife Commission  
% Commission Assistant  
6060 Broadway  
Denver, Colorado 80216

May 20th, 2021

Re: Eldorado Canyon State Park Draft Management Plan

Dear Parks and Wildlife Commission Members:

The Boulder Climbing Community, Action Committee for Eldorado, Access Fund, and Flatirons Climbing Council appreciate the work of the Colorado Parks and Wildlife staff in preparing the draft Management Plan for the Eldorado Canyon State Park (“ECSP”). The draft reflects, and seeks to find solutions to, the many challenges facing ECSP in this era of rapidly increasing use levels. We appreciate the opportunity to comment on the draft.

**Boulder Climbing Community (“BCC”)**

The mission of the BCC is to mobilize the local community and partners to care for the environments we impact as climbers and enrich the outdoor experience for all. The Boulder Climbing Community is a non-profit organization that connects and supports climbers, climbing organizations, land managers, and businesses in the Boulder area, in order to protect and care for the climbing areas we love. For more information on the BCC, visit [www.boulderclimbers.org](http://www.boulderclimbers.org)

**Action Committee for Eldorado (“ACE”)**

ACE is a non-profit organization dedicated to representing climbers’ interests in Eldorado Canyon State Park and preserving the opportunity to climb and the diversity of the climbing experience in Eldorado. ACE supports conserving the natural resources and promoting responsible recreational use and land management in ECSP. For more information about ACE, visit [www.aceeldo.org](http://www.aceeldo.org)

**Access Fund**

Access Fund is a national advocacy organization and accredited land trust whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 7 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest U.S. climbing advocacy organization with over 20,000 members and 115 affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational

outreach for climbing areas across the country. For more information about Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

### **Flatirons Climbing Council (“FCC”)**

The FCC is a local climbing organization representing the climbing community's interests in the City of Boulder Open Space Mountain Parks. In existence since 1998 the FCC's mission is equally focused on climbing advocacy, environmental stewardship and community outreach. The FCC assists the City of Boulder in administering new route development requiring fixed hardware in the Boulder Flatirons and to date this flagship program has successfully introduced over sixty five new routes during its seventeen year period. For more information, visit [www.flatironsclimbing.org](http://www.flatironsclimbing.org)

### **History of climbing in Eldorado Canyon**

Eldorado Canyon is rich in climber history and was important in the development of modern rock climbing in the 1950s and 1960s. In the 1970s, “Eldo” was at the forefront of the “clean and free” revolution with other notable destinations like Yosemite and the Shawangunks. The canyon has long attracted climbers from all over the world, and still receives thousands of climbers each year who come to test their skills on the famous routes that weave their way up impressive sandstone walls<sup>1</sup>.

Climbers have had a deep respect for the canyon long before it was incorporated as a state park and to this day work as stewards for the world-class area. Groups like ACE and BCC mobilize climbers to manage their own impacts, from trails to fixed hardware, and preserve the character and pristine nature of the park.

### **Comments**

#### **I. Pilot reservations system (p. 95-96)**

We have considerable concerns whether a reservation system will lead to the desired Indicators of Success (p.98) for ECSP and whether it will create at least as many problems as it will solve. The draft plan clearly states that visitors report a high level of satisfaction (climbers reported 100% satisfaction) with current recreation experiences and report extremely low displacement rates (p. 82). Visitors are not significantly concerned by existing crowding levels nor wait times. Parking serves as the primary mechanism for maintaining appropriate use levels that do not exceed carrying capacity or harm recreation experience (p. 83), so park-wide permitting strategies may not be warranted when targeted mitigation strategies could address site-specific crowding issues (such as picnic areas) and minimize the burden on all park visitors. We are also concerned that a blanket system like this could jeopardize a top park goal to “provide a wide variety of safe outdoor recreation experiences” (p.10) by forcing climbers to commit to certain weather windows that may not be conducive for rock climbing and have heightened hazard

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<sup>1</sup> Levin, Steve. *Eldorado Canyon: A Climbing Guide*. Sharp End Publishing, 2020.

due to the nature of the activity. Therefore, we oppose a universal, park-wide reservation system.

However, we recognize that the draft seems to commit ECSP to experiment with a pilot reservations system to see how well it would work. Accordingly, rather than revisit the question of whether there ought to be any pilot reservations system, we will focus on the key features that the pilot system should contain.

**Review period for adaptive management system.** We agree that an adaptive reservation system that is driven by monitoring data, visitor feedback and visitor-flow patterns is preferable. This review period should take into account updated user satisfaction levels and reevaluate all management strategies and whether or not they should be continued. We request that the draft plan include a specific date for an annual review of the pilot reservation system and the same VUMP advisory committee of stakeholders be invited to the review process.

**Limited to peak visitation days.** As anticipated by the draft, the reservation system should be limited to summer weekends and holidays (p.96). The draft anticipates a possible need to expand the system to cover other days if there is a shift in usage toward weekdays. No data exist to support the assertion that such a shift is likely. Most users, if unable to get a reservation for a peak visitation day, will go somewhere else that day. It is unlikely that many people will shift from weekend to weekday usage because work schedules and other constraints tend to dictate which days of the week people visit ECSP. But, if there is a large shift in usage, the pilot system will reveal that fact and adjustments could be made in future years. We recommend that the draft plan not assume that such a shift will occur.

**Limited to peak visitation hours.** Similar to the timed-entry system in Rocky Mountain National Park (“RMNP”), reservations should only be required for the peak visitation portion of the day (for those days when the system is in effect). People who arrive before or after that window should not require a reservation. The reservation system’s 80% parking capacity limitation already gives ECSP ample buffer to have some early or late arrivals without exceeding parking capacity. We recommend that ECSP limit the reservation system to only address actual peak-use hours.

**No time limit on length of stay.** ECSP users have widely varying lengths of stay -- from 15-minute quick looks to full days of climbing. As with the reservation system in RMNP, it is critical that users have the ability to stay till the end of the day, if they wish. Requiring climbers and others to leave earlier would dramatically undermine the experience that makes ECSP so valuable. Many climbs cannot be completed in a short amount of time and many climbers want to complete multiple climbs in a day. The draft’s reference to “without limits of visit length” (p.96) is important and needs to be incorporated into the pilot.

**Reservations should be tied to the car.** Given that a major impetus for the reservation system is the limits on parking, the reservation system should be car-based. That is, a

reservation should only be needed for those who enter ECSP by car (and not by bike, foot, or shuttle) and should cover the entire car regardless of how many occupants are in it. This will encourage carpooling and human-powered means of transport. We also ask that ECSP include language in the pilot system that allows for private (non CPW-operated) shuttles to and from the park. These privately run solutions could bolster a public shuttle, allow climbers greater freedom in how they access the park, and create an avenue for unique climber/ECSP partnerships.

**Reservation slots should be heavily weighted toward the morning.** Although it is appropriate to spread some of the entry slots throughout the day, the majority of the slots should allow entry early in the day. The pilot program will be in the summer, when it gets hot by midday and afternoon thunderstorms are common. Most climbers (and many other users, too) want to enter ECSP relatively early in the day, such as no later than 9 a.m.

**Some reservation slots should be held for spur-of-the-moment reservations.** The pilot needs to strike a balance between those who can make plans weeks or months in advance and those whose plans are more spur of the moment (p.96). ECSP attracts both local and international users. Many climbers can plan well in advance and want the certainty of a far-in-advance reservation. Others make plans much closer to the date, such as the day before, depending on work and other schedules, weather, partner availability, and other factors. We recommend that a meaningful portion of total available slots be held for day before reservations.

**The number of slots should reflect anticipated parking turnover.** Our experience, which is confirmed by the data in the draft (which allows a comparison of number of visitors to the number of parking spots), is that a parking spot may turn over many times during the day, reflecting the short stays of many visitors. We interpret the reference to “ECSP’s general patterns of parking turnover” (p.96) to reflect this fact. The number of reservation slots over the course of the day should be far greater than the number of parking spots, reflecting anticipated turnover. Inevitably, turnover cannot be predicted precisely for each day, and some days ECSP will hit capacity as those with reservations wait for people to leave and other days there will be people wishing to enter who cannot get a reservation despite the existence of unused parking spots. In striking the right balance, ECSP should not overweight the former concern or underweight the latter concern. The 80% capacity figure (p.96) is the lowest metric that should be used, as it will result in a large number of parking slots going unused. We recommend that ECSP be flexible and adjust this figure upward based on actual experience with parking turnover and no-shows.

**Limits on the number of reservations that can be held at one time.** To be equitable, the system should be structured to prevent individuals from booking a large number of days. The reservation system should not be a race to see who can type the fastest when the system opens. A cap on holding no more than 7 days of reservations, for example, would be reasonable, and people could then reserve additional days as they use their slots.

**Strong incentives not to waste slots.** The system should be structured to give strong incentives to cancel slots well before the target day, thereby making those slots available to

others. It should also have meaningful penalties for those who fail to use their slots. The penalties should not be draconian, as weather and life events can cause even the best-intentioned visitors to cancel their plans. But persons who repeatedly fail to show up should suffer a meaningful restriction in future reservations.

## **II. Climber dispersion**

The draft (p.82) refers to concerns about climbers congregating at a few of the most accessible crags and suggests that ECSP may take actions in the future to disperse climbers. We believe this is unnecessary and inadvisable, especially given the exceptionally high quality of experience levels (p. 82).

It is unnecessary because, for the most part, climbers will self-regulate. Land managers around the country, including at some very busy locations like Yosemite and the Shawangunks, have left these decisions to the climbers themselves. At virtually every climbing area in the country, climbers have learned to deal with crowding issues. Those who have flexible objectives can, and will, readily move to another climb or crag if their first choice is too crowded. On the other hand, some climbers place a high value on a specific climb and are willing to wait their turn. ECSP has some iconic climbs that draw climbers, including some from far away, who arrive with a specific climb in mind. Indeed, they will have brought equipment targeted at that particular climb and may be ill-equipped to unexpectedly shift to a quite different climb. Accordingly, it is better to continue the longstanding practice of letting climbers decide for themselves whether to wait or move to another location. Trying to force climbers to go to another crag not only uses the limited resources of ECSP personnel, but it creates needless tension and requires those personnel to make some difficult judgments about what is reasonable or safe for a climber whom they don't know.

## **III. Current entrance policy for human-powered users**

In order to promote alternative transportation over personal vehicle use and to avoid disincentivizing human-powered users, ECSP should revise the current entry fee process for annual pass holders utilizing their non-vehicle pass. The current system allows an annual pass holder in their vehicle to bring as many individuals as will fit in the vehicle with no additional fee. If that same annual pass holder decides to enter the park via human-powered means, each person accompanying the pass holder is charged an additional entry fee. The updated policy should allow an annual pass holder to bring in a car's worth of additional users with no additional fee.

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Boulder Climbing Community, Action Committee for Eldorado, Access Fund, and Flatirons Climbing Council appreciate your consideration of these comments. We are committed to working with ECSP on the long term stewardship and management of this world class climbing destination. We are willing and able to address any questions regarding these comments or

other climbing management issues. Please contact Kate Beezley ([kate@boulderclimbers.org](mailto:kate@boulderclimbers.org)) for any followup discussion.

Sincerely,



Kate Beezley, Boulder Climbing Community Executive Director



Mike Schlauch, Action Committee for Eldorado Chair of the Board



Erik Murdock, Access Fund Policy Director



Rui Ferreira, Flatirons Climbing Council Board President

cc:  
Taylor Luneau, American Alpine Club Policy Manager