



Protect America's Climbing

August 30, 2017

Carson National Forest
208 Cruz Alta Road Taos, NM 87571
Submitted via email: carsonplan@fs.fed.us

RE: Access Fund Comments on Preliminary Draft Proposed Land and Resource Management Plan for the Carson National Forest

Dear Planning Team,

Access Fund appreciates this opportunity to comment on the Preliminary Draft Proposed Land and Resource Management Plan for the Carson National Forest. The Carson National Forest holds many of New Mexico's premier rock climbing areas. These comments are intended to assist planners in the development of appropriate management strategies for these climbing areas and to protect climbing access, while fulfilling the stewardship responsibilities of the Carson National Forest.

Access Fund

Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund has over 15,000 members and 100 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service¹ to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

Carson National Forest offers spectacular climbing opportunities in New Mexico, drawing climbers from all over the state as well as neighboring states. Many climbs were established in the 1970's and offer well-established bolted sport routes and traditional routes with fixed anchors that warrant long-term maintenance. Each climbing area within the Forest is unique, and site specific considerations should determine the appropriate level of management. Access Fund provided an inventory of dispersed climbing areas and associated use-patterns, in a previous public comment phase.²

¹See: <https://www.accessfund.org/uploads/Access-Fund-USFS-MOU-2014.pdf>

² See: <https://www.accessfund.org/uploads/NM-Access-Fund-Comments-on-Carson-National-Forest-Wilderness->

The Preliminary Plan-*Cliffs and Rocky Features* section states, *'installation of permanent rock climbing hardware and use of motorized drills should be prohibited or restricted, to maintain the geological and biological features and scenic quality of the climbing area.'*³ Additionally the *Haplopappus Microcephalus Botanical Area* section states, *'Installation of permanent rock climbing hardware and the use of motorized drills should be minimized.'*⁴

Access Fund supports management practices that balance resource protection with recreation and climbing access. We are concerned that the current language regarding fixed anchors (see below for explanation of fixed anchors) in Carson National Forest is both restrictive and non-prescriptive – potentially leading to future management issues and confusion. We request these guidelines be changed to, ***'Placement of rock climbing fixed anchors may require prior authorization to maintain the geological and biological features and scenic quality.'*** This is in alignment with the Forest Service definition⁵ of fixed anchors and best management practices for similar public lands.

Access Fund submitted a DRAFT Climbing Management Plan (CMP) to the Questa Ranger District in May 2017. The framework of this CMP could be scaled to Carson National Forest and serve as a detailed, site specific plan to manage fixed anchors and climbing within Carson National Forest. A similar climbing management plan is currently being implemented in the Pike National Forest to manage climbing and fixed anchors within the South Platte climbing area.⁶

Fixed Anchors

Fixed anchors, defined by the Access Fund and the USDA Forest Service⁷ as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor.

Inventory-2016.pdf

³ Preliminary Draft Proposed Land and Resource Management Plan for the Carson National Forest. Pg 110- Cliff and Rocky Feature Guidelines (FW-CRF-G).

⁴ Preliminary Draft Proposed Land and Resource Management Plan for the Carson National Forest. Pg 199- Haplopappus Microcephalus Botanical Area Guidelines (DA-BOT-G).

⁵ See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>

⁶ See:

<https://docs.google.com/viewer?a=v&pid=sites&srcid=Y2xpbWJpbmdtYW5hZ2VtZW50Lm9yZ3x3d3d8Z3g6MWZiMDEwMmY5OWNkYTlkZA>

⁷ See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiate

The vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor.⁸

Fixed anchors, specifically bolts, necessitate long-term maintenance.⁹ Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently.¹⁰

Some of the existing developed climbing areas within Carson National Forest are dependent on fixed anchors, or bolts (permanent fixtures in the rock that are ~3/8" diameter and ~3" long), to provide climbers with a modicum of safety. Climbing resources in Carson National Forests provide the public with unique opportunities to experience primitive, human-powered recreation in beautiful settings. Preventing or restricting the use of fixed anchors within Carson National Forest is not in alignment with the Forest Service's Sustainable Recreation framework, as well as its commitment to support appropriate forms of recreation such as rock climbing.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners develop a comprehensive climbing management plan that protects natural and cultural resources while allowing climbing and the use of fixed anchors within Carson National Forest. In Addition, Access Fund can help identify and improve the climbing related trail system, roads, and other management needs the Forest may require to provide for the climbing opportunities found in Carson National Forest. Some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program¹¹ or assistance from our Conservation Team¹² which 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 these comments on the Preliminary Draft Proposed Land and Resource Management Plan for the Carson National Forest. Access Fund has the experience, local

⁸ 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).

⁹See <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

¹⁰ *Ibid.*

¹¹ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm

¹² See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. 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 (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in cursive script that reads "Katie Goodwin".

Katie Goodwin
Public Lands Associate
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director
Bryan Pletta, New Mexico Climbers Resource and Advocacy Group