



Protect America's Climbing

December 21, 2017

Steve Guglielmi  
Forester  
Department of Environmental Conservation  
PO Box 296/1115 State Route 86  
Ray Brook, NY 12977

Submitted via email: R5.UMP@dec.ny.gov

**RE: Access Fund Comments on the Sentinel Range Wilderness Unit Management Plan**

Dear Mr. Guglielmi,

The Access Fund appreciates this opportunity to comment on the Sentinel Range Wilderness Unit Management Plan (Plan). The Adirondack Park contains many of the Northeast's premier rock climbing and ice climbing areas. These comments are intended to assist planners in the development of land management policy as it applies to fixed anchor management in the Sentinel Range Wilderness that protect climbing access, while maintaining the ecological integrity and character of the Adirondack Park.

**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 supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 15,000 members and 120 affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit <https://www.accessfund.org/>.

**Comments**

The Sentinel Range Wilderness Unit hosts a number of popular rock and ice climbing destinations. Each climbing area within the Unit is unique, and site-specific considerations should determine the appropriate level of management. Because the Department of Environmental Conservation (DEC) has not completed an assessment of use levels and comprehensive inventory of fixed anchors within the unit, it is important that the Access Fund and the climbing community work with the DEC (e.g., through participation in this Unit Management Plan revision process) on the proposed management action affecting climbing resources so that longstanding climbing areas, and trails are identified and appropriately managed and maintained. These comments are intended to assist the DEC to ensure

that climbing access is protected, and appropriate management prescriptions will both maintain the health of the park and protect nationally-significant climbing opportunities.

### **Fixed Anchors in Adirondack Park**

Access Fund does not support the current Department regulation regarding bolts/fixed anchors: *'The placement of bolts, or other fixed anchors which involve drilling or defacement of the rock is a violation of Department regulations (6 NYCRR 190.8(g) -- "No person shall deface, remove, destroy, or otherwise injure in any manner whatsoever any . . . rock, fossil or mineral..."). The APSLMP does not discuss the appropriateness of fixed anchors.'*<sup>1</sup>

However, Access Fund supports the Plan's objective to, *'Manage rock climbing sites to minimize environmental impacts.'*<sup>2</sup> Often the use of fixed anchors minimize environmental impacts by protecting cliff top ecology.<sup>3</sup>

It is clear that climbing is considered an appropriate use within the Adirondack Park.<sup>4</sup> Due to the need for climbers to descend and occasionally place fixed protection on sections of cliff faces that will not accept any other form of gear, fixed anchors are an important piece of the overall climbing system that rock and ice climbers use while recreating. Rock climbing and the use of judiciously placed fixed anchors are in line with maintaining the unit's wilderness character; climbing provides opportunities for solitude and a primitive and unconfined form of recreation.<sup>5</sup> Fixed anchors, defined by the Access Fund and other national organizations and agencies 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.<sup>6</sup> 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. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in wilderness.<sup>7</sup>

The Access Fund does not support a temporary moratorium on the replacement and maintenance of existing fixed hardware.<sup>8</sup> Access Fund supports a process through which fixed anchors are considered and managed on a site specific basis. Fixed anchors, specifically bolts, necessitate long-

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<sup>1</sup> [http://www.dec.ny.gov/docs/lands\\_forests\\_pdf/sentinelump.pdf](http://www.dec.ny.gov/docs/lands_forests_pdf/sentinelump.pdf) Pg. 102

<sup>2</sup> Ibid.

<sup>3</sup> <http://www.climbingmanagement.org/issues/vegetation>

<sup>4</sup> [http://www.dec.ny.gov/outdoor/101035.html#Protect\\_Yourself](http://www.dec.ny.gov/outdoor/101035.html#Protect_Yourself)

<sup>5</sup> [http://www.dec.ny.gov/docs/lands\\_forests\\_pdf/sentinelump.pdf](http://www.dec.ny.gov/docs/lands_forests_pdf/sentinelump.pdf) Pg.70

<sup>6</sup> [https://www.accessfund.org/uploads/pdf/AF-AAC\\_FixedAnchorPolicy\\_20150428.pdf](https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf)

<sup>7</sup> 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.

<sup>8</sup> [http://www.dec.ny.gov/docs/lands\\_forests\\_pdf/sentinelump.pdf](http://www.dec.ny.gov/docs/lands_forests_pdf/sentinelump.pdf) Pg. 101

term maintenance.<sup>9</sup> 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.<sup>10</sup> It is essential that climbers be permitted to replace and maintain existing bolts in Adirondack Park through this planning process. Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Sentinel Range Wilderness Unit) depend on long-term stewardship in order to maintain the established climbing routes and descents.

## **Conclusion**

Access Fund recommends the Department's current regulation regarding fixed anchors<sup>11</sup> be amended to allow for managed placement and use of fixed hardware where appropriate. The judicious placement of fixed hardware is essential part of the overall climbing system that rock and ice climbers use while recreating. Rock climbing and the use of fixed anchors are in line with maintaining the unit's wilderness character; climbing provides opportunities for solitude and a primitive and unconfined form of recreation. Access Fund requests the ongoing maintenance and repair of existing fixed hardware be permitted throughout this planning process and temporary moratorium on new fixed anchors. Access Fund encourages the DEC to partner with the climbing community to inventory existing fixed hardware and develop a collaborative fixed hardware management plan.

## **Access Fund Assistance**

The climbing community and the Access Fund are ready, willing, and able to help the DEC inventory existing climbing routes and fixed hardware. In addition we can assist in improving climbing related trail systems, develop a sound anchor management plan, and any other management needs the DEC may require to provide for the climbing opportunities found in the Adirondack Park. Some aspects of this planning initiative would qualify for assistance from our Conservation Teams which help maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address erosion issues on climbing access trails, and providing training on planning and stewardship best practices to keep those areas healthy.<sup>12</sup>

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

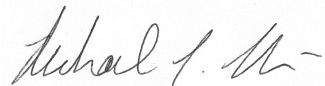
<sup>10</sup> *Ibid.*

<sup>11</sup> [http://www.dec.ny.gov/docs/lands\\_forests\\_pdf/sentinelump.pdf](http://www.dec.ny.gov/docs/lands_forests_pdf/sentinelump.pdf) Pg. 102

<sup>12</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm).

Thank you for your consideration of these comments on the Sentinel Range Wilderness Unit Management Plan. The Access Fund has the experience, local contacts, and resources to help planners develop and implement sound climbing management strategies that encourage climbing while sustaining the health, diversity and productivity of the Adirondack Park. The Access Fund looks forward to participating throughout the process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (720-624-6051) or email ([mike@accessfund.org](mailto:mike@accessfund.org)) to discuss this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Morin". The signature is fluid and cursive, with a horizontal line at the end.

Michael Morin  
Northeast Regional Director  
Access Fund

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