



Protect America's Climbing

February 18, 2014

Coronado Forest Plan Revision  
P.O. Box 1919  
Sacramento, CA 95812

Email: [CoronadoNF@fscomments.org](mailto:CoronadoNF@fscomments.org)  
Subject: Coronado National Forest, Plan Revision EIS

**RE: Access Fund Comments on Coronado National Forest Draft Land Management Plan and Programmatic Draft Environmental Impact Statement**

Dear Coronado National Forest Planning Team:

The Access Fund appreciates this opportunity to provide comments on the Coronado National Forest (NF) Draft Land Management Plan and Programmatic Draft Environmental Impact Statement. The Access Fund can provide climbing management expertise, funding, and community outreach to assist the Coronado NF with the management of its extensive climbing resources.

**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 2.3 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 10,000 members and affiliates. The Access Fund partners with the BLM, Forest Service, National Park Service, and US Fish & Wildlife Service on the national and local levels to provide climbing management expertise, stewardship, project specific funding, and educational outreach. We currently hold [memorandums of understanding](#)<sup>i</sup> with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how climbing will be managed on federal land. Arizona is one of our larger member states and many of our members from Arizona and around the country regularly travel to climb on Coronado NF land.

For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## COMMENTS

### **Climbing on Coronado National Forest**

The Access Fund appreciates that the Draft Land Management Plan acknowledges that rock climbing is a legitimate, dispersed recreational activity in the *General Description* of the *Recreation* section. The Coronado NF provides year round world-class climbing opportunities for southern Arizona residents as well as visitors from around the country and world. The Coronado NF provides climbing options that range from short, easy-to-access climbs to long, adventurous, backcountry outings. The most visited, prolific and documented climbing resources are located along the Mt. Lemmon Highway and in the Dragoon Mountains (Cochise Stronghold). There are several thousand established rock climbs located on the Coronado NF that represent a rich history of southern Arizona climbing. Technical climbing on the Coronado NF began in the 1950s and new routes continue to be developed and discovered to this day.

### **Engaging the Climbing Community**

We applaud Coronado NF's intention to engage the climbing community in order to collaborate on cliff management activities, seasonal raptor and bighorn closures, and education (page 56). The Access Fund also encourages Coronado NF to collaborate with the climbing community (Southern Arizona Climbers Coalition and the Access Fund) on service projects to reduce erosion and improve access. Please contact us for assistance developing climbing management strategies. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* has proven to be a useful tool for land managers across the country.<sup>ii</sup> In addition, future climbing access service projects may qualify for Access Fund Climbing Preservation Grants<sup>iii</sup> or assistance from our Conservation Team<sup>iv</sup> 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.

### **Climbing as Example of Recreation Impacts**

The Access Fund strongly opposes the consideration of a permit or reservation system for any rock climbing area with the Coronado NF. The Draft Land Management Plan lists 'popular rock climbing locations' as an example of a recreation site with the potential for resource damage or visitor conflicts (page 77-78). There is currently no data, based on visitor use monitoring or otherwise, to suggest that 'popular rock climbing locations' would experience any increased natural resource or visitor experience protection from the implementation of a permit or reservation system. The use of such data is critical to understanding the effects of visitor encounters as well as the relationship between use-levels and resource impacts. However, such climbing related data is currently not captured by the Forest Service's *National Visitor Use Monitoring* (NVUM) program. Given the lack of national protocols for NVUM related to climbing, it is important that Forest planners take extra measures to contact the climbing community to

better inventory climbing activity and use patterns so that longstanding climbing access roads and trails are identified and appropriately managed and maintained. Collaboration with the local climbing community will yield much better results toward the goal of reducing resource impacts and improving visitor experience.

The Access Fund also asks that the Coronado NF remove any statements that use rock climbing as an example of an activity that causes unparalleled resource impacts when other similar recreation activities are not included as equal examples. Under the *Desired Conditions* heading of the *Recreation* section, rock climbing is included with activities, such as paintballing and geocaching, as an example of an activity that can cause excessive impacts (page 75). Again, under the *Guidelines* heading of the same section, rock climbing is the only activity listed that ‘should be managed to balance demand for the activity and the need to protect plants, animals and other natural resources’ (page 76). The Access Fund certainly agrees that rock climbing should be managed to prevent resource impacts, although many activities (e.g., OHVs, geocaching, hunting, paintballing, mountain biking, hiking, skiing, etc.) should be managed toward the same end. We therefore request that rock climbing not be highlighted as an activity associated with disproportionate impacts to the environment and other forest visitor’s experiences. Rock climbers in southern Arizona have a long history of being responsible stewards of Coronado NF’s climbing resources and have initiated a variety of resource protection activities such as raptor monitoring in the Dragoon Mountains and roadside cleanups (gathering general public’s trash) in the Catalina Mountains. Based on history, rock climbers should be highlighted for their conservation ethic rather than potential for creating impact.

### **Dragoon Ecosystem Management Area**

Rock climbing in the Dragoon Mountains (known to climbers as Cochise Stronghold) is world renowned. Tall, high quality granite domes combined with a remote setting provide a unique rock climbing experience. The Access Fund endorses the Wild Backcountry Zone boundary of the Dragoon Ecosystem Management Area as depicted on page 131, figure 6 of the Draft Land Management Plan. We believe that Wild Backcountry is an appropriate land use zone for much of the Dragoon Ecosystem Management Area because it protects the resource from off-road motorized travel while promoting unconfined, adventurous recreation such as rock climbing, hiking, and mountain biking. We do not support wilderness designation because it limits the options to maintain fixed anchors that facilitate the safe ascent and descent of technical terrain. Cochise Stronghold has a long history of bold, noteworthy technical climbing ascents using minimal fixed anchors. It is an important climbing resource that needs to be maintained (through fixed anchor maintenance and replacement using hand and mechanized equipment) in perpetuity in order to provide the same experience to future generations of climbers as the one experienced during the golden age of Cochise Stronghold climbing during the 1970s. The Access Fund supports the extent of the Wild Backcountry Zone of the Dragoon Management Area as a management tool to protect both the natural and cultural resources as well as the climbing experience.

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Overall, the Draft Land Management Plan concepts related to rock climbing are reasonable, and subject to some minor yet important changes, we support Coronado NF's approach. As mentioned in the comments, using rock climbing as an example of recreation impacts (when other, higher-impact activities are not highlighted) is not only misleading due to the low-impact nature of rock climbing, but also belies the long history of climber conservationists on the Coronado NF. The Access Fund has the experience, local contacts, and resources to help Coronado NF collaborate with local climbers to improve and steward the climbing environment. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (720-588-3512) or email ([erik@accessfund.org](mailto:erik@accessfund.org)) to discuss this matter further.

Best Regards,



Erik Murdock, PhD  
Policy Director  
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director  
Scott Ayers, Southern Arizona Climbers Coalition, Chairman

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<sup>i</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration\\_with\\_federal\\_agencies.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm).

<sup>ii</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

<sup>iii</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm).

<sup>iv</sup> [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).