



June 2, 2021

BLM Taos Field Office  
Attn: Horsethief Mesa TMP  
226 Cruz Alta Road  
Taos, NM 87571

Submitted online at <https://eplanning.blm.gov/eplanning-ui/project/1505217/510>.

**RE: Access Fund and NM CRAG Comments on Horsethief Mesa TMP EA**

Dear BLM Taos Field Office Travel Management Staff,

The Access Fund and NM CRAG appreciate this opportunity to provide comments on the BLM's draft Environmental Assessment (EA) for the Horsethief Mesa Travel Management Plan (TMP). Horsethief Mesa provides valuable recreational opportunities for local residents and also acts as a crucial access corridor to popular and high-quality climbing areas. We look forward to collaborating with the BLM on management strategies that protect both the integrity of the land and continued climbing opportunities.

**NM CRAG**

New Mexico Climbers Resource and Advocacy Group (NM CRAG) is a New Mexico not-for-profit 501c(3) corporation that represents climbers in New Mexico. NM CRAG seeks to protect access to our climbing areas, while improving and preserving them for the future.

**The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## **Comments**

NM CRAG and Access Fund appreciate the wide range of alternatives presented by the BLM in the current TMP EA. Specifically, we appreciate the changes made by the BLM from the scoping period to now include much needed rim-top access to the John Dunn Bridge climbing areas in alternatives A, C, D, and E. All of these alternatives keep critical access routes open, and will allow climbing to continue at high quality winter zones, including the Solar Asylum and New Buffalo crags.

As a part of the larger human-powered recreation community, NM CRAG and Access Fund support alternative E in particular. The expansion of mountain bike trails that this alternative proposes would be a boon for all human-powered recreationists in the Taos region, and would vastly increase mountain bike access to the Horsethief Mesa area. These trails have been carefully considered by the Taos Mountain Bike Association (TMBA) and Enchanted Circle Trails Association (ECTA). With proper management (i.e., keeping trails well-marked and confined so that tire and foot traffic are kept to a minimum area, and taking other appropriate erosion control steps), these trails should minimize additional environmental impact to the area, in exchange for excellent new human-powered recreation opportunities. Alternative E provides a good balance between minimizing impacts on natural and cultural resources while still providing opportunities for recreation and access, and best meets BLM's multiple use mandate identified in the Federal Land Policy and Management Act of 1976 (FLPMA).

NM CRAG and Access Fund strongly believe that the ecological integrity of the Horsethief Mesa area must be preserved, and encourage steps taken by the BLM and recreation community to do so. While we support many of the provisions designed to protect and steward Horsethief Mesa currently in Alternative B (i.e., the resource protection alternative), we cannot support it in its current form due to the major loss of climbing access that the alternative currently entails. Specifically, Alternative B as written currently closes road IDs 88, 66, 2486, 58, 57 and 56, which are needed for rim-top access to the climbing areas mentioned previously. We feel that Alternative B does not provide a good balance between natural resource protection, cultural resource protection, recreation, and access, and does not meet BLM's multiple use mandate in FLPMA.

### **Justice, Equity, Diversity, and Inclusion (JEDI)**

Access Fund urges the BLM to work with the local community to advance inclusive and equitable access to the Horsethief Mesa area and its recreational opportunities. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area located in a diverse community, as well as within a short drive of large urban centers like Santa Fe, Horsethief Mesa should be accessible to people from a true diversity of backgrounds. Access Fund has staff dedicated to JEDI issues, and is more than willing to offer our time and resources to assist the BLM in applying JEDI principles to their work in the Taos area.

### **Access Fund Assistance**

The climbing community and the Access Fund are ready, willing, and able to help planners

identify and improve the climbing related infrastructure, trail system, roads, and other management needs the BLM may require to provide for the climbing opportunities found in the Horsethief Mesa area. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team, which helps maintain<sup>1,2</sup> 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.

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Thank you for your consideration of these comments on the BLM's scoping process for the Horsethief Mesa TMP. Access Fund and NM CRAG have the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. Access Fund and NM CRAG look forward to continuing to work with the BLM. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 552-2843 or via email ([katie@accessfund.org](mailto:katie@accessfund.org), [bryan@stoneageclimbinggym.com](mailto:bryan@stoneageclimbinggym.com), and [taimur@accessfund.org](mailto:taimur@accessfund.org)) to discuss this matter further.

Sincerely,



Katie Goodwin - Access Fund, Policy Analyst



Bryan Pletta - NM CRAG, President



Taimur Ahmad - Access Fund, Policy Associate

Cc:

Chris Winter-Access Fund, Executive Director

Erik Murdock-Access Fund, Policy Director

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<sup>1</sup> <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

<sup>2</sup> <https://www.accessfund.org/pages/conservation-team>