



Protect America's Climbing

February 22, 2016

Carson National Forest  
208 Cruz Alta Road  
Taos, NM 87571

Submitted via email: [carsonplan@fs.fed.us](mailto:carsonplan@fs.fed.us)

**RE: Access Fund Comments on Carson National Forest Plan Revision – Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System**

Dear Planning Team,

The Access Fund appreciates this opportunity to comment on the Carson National Forest Phase 2 of the *Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System* (Inventory). 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 alternatives for wilderness recommendations that enhance and protect climbing access, while maintaining the wilderness character of the National Forests.

**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 13,000 members and 100 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service<sup>1</sup> 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](http://www.accessfund.org).

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<sup>1</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).

## COMMENTS

The Carson National Forest contains a high concentration of established rock climbs in New Mexico. Each climbing area within the Forest is unique, and site specific considerations should determine the appropriate level of management. Because the Forest Service does not have a complete inventory of dispersed climbing areas and associated use-patterns, it is important that the Access Fund, and the climbing community, inform the Forest Service (e.g., through participation in this Forest Plan revision process) on the climbing resources so that longstanding climbing areas, access roads and trails are identified and appropriately managed and maintained. Furthermore, considering the lack of national-level Forest Service guidance on the use and placement of fixed anchors in wilderness (presumed to be issued through the forthcoming FSM 2320), and the fact that climbing occurs in wilderness and in inventoried wilderness, it is important the Forest Service is aware of the locations and best practices associated with rock climbing. These comments are intended to assist the Forest Service to ensure that climbing access is protected, and appropriate management prescriptions and designations will both maintain the health of the forest and enhance nationally-significant climbing opportunities.

### **Climbing in wilderness**

Climbing is considered an appropriate wilderness activity<sup>2</sup>; however, not all types of climbing activities are suitable within designated wilderness areas. Fixed anchors<sup>3</sup>, although conditionally allowed in most Forest Service, Bureau of Land Management and National Park Service wilderness areas, can be problematic with regard to wilderness management.<sup>4</sup> Fixed anchors, defined by the Access Fund and the USDA Forest Service,<sup>5</sup> 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. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes

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<sup>2</sup> National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012 state that climbing is an appropriate wilderness activity. The USDA National Forest Service has yet to issue a national policy on wilderness climbing; however, climbing is allowed in most every national forest with climbing resources. There are approximately 7,000 climbing areas in national forest wilderness (source mountainproject.com).

<sup>3</sup> [https://www.accessfund.org/uploads/pdf/AF-AAC\\_FixedAnchorPolicy\\_20150428.pdf](https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf)

<sup>4</sup> National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012

<sup>5</sup> 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>

thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in wilderness.<sup>6</sup>

Fixed anchors, specifically bolts, necessitate long-term maintenance.<sup>7</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>8</sup> Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts.<sup>9</sup> Motorized drills are specifically prohibited in designated wilderness and often (but not necessarily) prohibited in recommended wilderness areas. Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Carson National Forests wilderness inventory) depend on long term stewardship in order to maintain the established climbing routes and descents.

We believe that the well-developed and existing climbing areas in Carson National Forest are “substantially noticeable”<sup>10</sup> “developed recreation sites”<sup>11</sup> and should thereby be excluded from wilderness recommendations in order to prevent undesirable future management issues. The reason why the developed climbing areas should be considered “substantially noticeable” is that the many climbing routes 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. The Forest Service Land Management Planning Handbook clearly states that “[a]s a general rule, developed sites should not be included [as wilderness]”.<sup>12</sup> The climbing areas highlighted in the following section of these comments are well-established and some were developed as early as the 1970’s. These “developed recreation sites” are “substantially noticeable”, and should not be

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<sup>6</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>7</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

<sup>8</sup> Id.

<sup>9</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

<sup>10</sup> The Wilderness Act states that wilderness “(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable . . .” (16 U.S.C. 1131c).

<sup>11</sup> Carson National Forest Service Wilderness Process Step 1: Inventory Preliminary Inventory Criteria

<sup>12</sup> Forest Service Handbook 1909.12 – Land Management Planning Handbook, Section 71.22b, number 7.

included within recommended as wilderness in order to effectively maintain the exceptional climbing opportunities of today into the future.

### Recommendations for Carson National Forest

Carson National Forest offers some 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. The table below lists the location of the climbing areas and the associated Preliminary Wilderness Inventory Area ID that we recommend be removed from the inventory or adjusted to exclude valuable climbing resources.



<b>Carson National Forest: Recommendations for removal of polygon or boundary adjustment</b>			
<b><i>Preliminary Wilderness Inventory Area ID</i></b>	<b><i>Climbing Area Name</i></b>	<b><i>Coordinates</i></b>	<b><i>Description</i></b>
W24	Sideshow Attraction	36.3904°, -106.2349°	Multiple established bolt-dependent routes
W24	Little River Wall	36.3891°, -106.2345°	Over 30 established bolt-dependent routes
W24	El Rito Trad	36.4154°, -106.1974°	Over 20 established traditional routes
W22	El Rito Sport	36.3924°, -106.1969°	Nearly 100 established bolt-dependent routes.
W19	Ortega West	36.4077°, -106.1302°	Bouldering
W19	Slot Machine	36.4124°, -106.1443°	Multiple established bolt-dependent routes.
C14	Comales Canyon	36.1585°, -105.5840°	Approximately 50 established bolt-dependentsport and traditional routes.
Q2	Lion's Den	36.6890°, -105.5459°	Multiple established bolt-dependentsport routes

### Summary of Recommended Changes

Access Fund recommends that Preliminary Wilderness Inventory Area ID's **W24, W22, W19, C14,**

and **Q2** are adjusted to not include developed and well established climbing areas. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to the climbing community. Climbing resources in Carson National Forests provide the public with unique opportunities to experience primitive, human-powered recreation in beautiful settings. Longstanding, developed climbing areas within recommended wilderness invite future management issues that are avoidable. Preventing these types of issues is 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 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. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>13</sup> or assistance from our Conservation Team<sup>14</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.

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Thank you for your consideration of these comments on potential wilderness recommendations. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. The 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 (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Best Regards,



Erik Murdock  
Policy Director  
The Access Fund

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

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<sup>13</sup> See [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>14</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).