



Protect America's Climbing



NMCRAAG
NEW MEXICO CLIMBERS' RESOURCE & ADVOCACY GROUP

November 2nd, 2021

ATTN:

Plan Revision Team

Lincoln National Forest

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Submitted online at:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=45148>

Comments on Draft Plan and Environmental Impact Statement for the Lincoln National Forest

Dear Forest Planning Team:

The Access Fund appreciates this opportunity to provide feedback on the Draft Plan and Environmental Impact Statement (DEIS) for the Lincoln National Forest Land. The Lincoln National Forest (LNF) holds many of New Mexico's premier rock climbing areas.¹ We appreciate that climbing is acknowledged as one of the many recreational uses of the Forest. The Access Fund submits these comments to assist planners in the development of appropriate management strategies that enhance and protect climbing access, while maintaining the health of the National Forest.

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 and accredited land trust supporting and representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 20,000 members and 123 affiliates. We currently hold a memorandum of understanding with the Forest Service that forms the basis upon which mutually beneficial programs, projects, training, and other recreational activities may be planned and accomplished, and strengthens the framework of cooperation between the Access Fund and USFS.² The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Many of the Access Fund's members reside

¹ <https://www.mountainproject.com/area/105708964/new-mexico>.

² http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

and climb in New Mexico's Lincoln National Forest. For more information about the Access Fund, visit www.accessfund.org.

New Mexico - Climbing Resource and Advocacy Group

New Mexico Climbers Resource and Advocacy Group (NM CRAG) represents climbers in New Mexico. We want to protect access to our climbing areas, while improving and preserving them for the future. For more information about NM CRAG visit: <https://www.nmcrag.org/>.

COMMENTS

The Lincoln National Forest offers exceptional climbing opportunities, utilized by both New Mexicans and visitors coming from out of state. With outstanding sport, bouldering, and backcountry climbing opportunities, the Lincoln provides a diverse array of climbing-based recreation in a beautiful setting. As climbers, we strongly support the protection of cultural and natural resources in addition to recreational opportunities, and believe that the LNF can preserve and enhance climbing on the Forest while also ensuring that these crucial resources remain pristine. The Access Fund and NMCRAAG are eager to assist the Forest Service in devising management strategies that meet the goals of all stakeholders. Each climbing area within the LNF is unique, and site specific considerations should determine the appropriate level of management. The following comments outline policy we believe the LNF should integrate into the planning process.

Site Specific Comments

Smokey Bear Ranger District

The Smokey Bear RD contains highly adventurous wilderness climbing opportunities in the Capitan Mountains as well as in the Ruidoso³ area. Due to the remote nature of the wilderness climbing in this district, few climbers will pursue it. For those who do however, the backcountry in the area provides outstanding opportunities for primitive and unconfined recreation. Wilderness climbing is a treasured experience for those who seek it out and has a relatively minimal impact to the resource. For more on wilderness climbing policy and best practices, please see the dedicated section starting on page 6 of these comments.

Guadalupe Ranger District

The Guadalupe RD contains two major crags: Sitting Bull Falls⁴ and Last Chance Canyon.⁵ This district in particular has a tremendous amount of untapped climbing potential that, if developed, would dramatically increase the amount and quality of climbing resources on the Lincoln. Due to concerns over impacts to historic sites, there is currently a bolting moratorium

³ <https://www.mountainproject.com/area/114277421/ruidoso-area>

⁴ <https://www.mountainproject.com/area/105854414/sitting-bull-falls>

⁵ <https://www.mountainproject.com/area/105920274/last-chance-canyon>

on the district. We absolutely support the need to protect such sites, and also believe it is possible to do so while allowing a higher degree of access for new route development than a blanket moratorium. We urge Forest planners to collaborate with local climbers, NMCRA, and the Access Fund to devise policies that allow for access to the remarkable unutilized climbing resources in this district, especially in Last Chance Canyon, while simultaneously protecting critical historic sites.

Sacramento Ranger District

The most prominent climbing area on the Sacramento RD is the Tunnel.⁶ It is likely the most visited climbing area on the Lincoln. There is a moderate level of erosion at staging areas and currently no official agreements between the LNF and local climbers on maintenance. Though the climbing area is in overall good condition, collaboration between the LNF and local climbers on long term maintenance via an MOU or similar arrangement would be desirable for the health of the crag going into the future.

Climbing Access

The Access Fund strongly advocates for rock climbing to be recognized as an appropriate activity across the Forests and all ROS categories.⁷ Climbing is a relatively low impact activity that can be managed sustainably to the mutual benefit of the public and the Forest. Therefore, access to climbing resources should be maintained and protected. Climbers have a well-established record of supporting natural and cultural resource based closures and restrictions. Where necessary, we ask that closures be well-substantiated and lifted when determined unneeded. Clear and timely information (on closures, trail conditions, use patterns, etc.) will facilitate positive outdoor recreation experiences and reduce conflict amongst visitors.

The Access Fund offers to partner with the Lincoln National Forest to work on improving existing access trails and paths to established climbing areas. By allowing the Access Fund⁸ and affiliated local climbing organizations such as NMCRA to assist the Forest Service in stabilizing main access paths and trails and reclaim braided social trails, climbers can minimize their impact while hiking and improve erosion control. Existing infrastructure should be maintained and potentially expanded in established sport climbing or bouldering areas which see a higher volume of climbers.

The Access Fund encourages improving climbing access for all of the public including gateway communities and underserved populations. By developing partnerships with the Access Fund and other like-minded organizations, we can work to deepen connections between the Forest and the broader public. The Access Fund is committed to educating climbers on best practices while climbing and visiting natural landscapes and wilderness, including programming directed

⁶ <https://www.mountainproject.com/area/105916485/the-tunnel>

⁷ See http://www.fs.fed.us/cdt/carrying_capacity/rosfieldguide/ros_primer_and_field_guide.htm.

⁸ See <https://www.accessfund.org/meet-the-access-fund/our-approach/stewardship-conservation>.

at facilitating environmentally responsible transitions from indoor gym climbing to climbing outdoors – a trend that is driven by the popularity of indoor climbing gyms.⁹ We hope that the Forest will continue to manage rock climbing resources in a manner that balances access to recreation and conservation of the climbing environment.

Alternatives and Sustainable Recreation

All action alternatives contain high-level guidance that promotes ecological integrity, cultural resource protection, forming partnerships with stakeholders, and sustainable recreation.¹⁰ The preferred alternative in particular strikes a good balance between access and resource protection. As part of managing sustainable recreation, however, rock climbing should be more clearly identified and acknowledged throughout all alternatives. The growth in both general recreation and in climbing means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the LNF. Although climbing is listed in the draft plan, the final plan should specifically mention climbing and other recreational activities whenever there is an opportunity to do so. We are happy to provide a detailed inventory of climbing area locations on the Lincoln to assist the planning team in further incorporating climbing management into the draft plan and DEIS.

Alternative C proposes new wilderness in ID number SRD48a that overlaps with the Tunnel sport climbing area, a long-established and highly developed destination. “Bolt intensive face climbs,” which the sport climbs at the Tunnel overwhelmingly are, are generally considered by federal land managers to be incompatible with wilderness.¹¹ While we very much support wilderness designations and alternatives that focus on ecological integrity in general, we urge the Forest to adjust the recommended wilderness boundaries in SRD48a to exclude the sport climbing resources already present in that area should the Forest choose to implement alternative C.

There is also some relatively undeveloped but extant sport climbing that would overlap with alternative C’s recommended wilderness in ID SRD48b. There is no online information for this climbing area at present, but we can provide GIS data as needed to assist with mapping and boundary adjustments.

Desired Conditions

Desired Conditions and guidelines were specifically added for some at-risk cultural resources to mitigate disturbance from recreational rock climbing. We generally support the Desired Conditions related to mitigating impacts from rock climbing activities, however we offer the following proposed desired conditions be added to the plan:

⁹ See <https://www.accessfund.org/learn/the-climbers-pact>.

¹⁰ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd931445.pdf, p. 21

¹¹ https://www.nps.gov/policy/DOrders/DO_41.pdf p. 15

1. Recreation management recognizes and identifies rock climbing throughout the Forest Plan as a legitimate wilderness and non-wilderness activity, and LNF planners acknowledge the conditional use of fixed climbing anchors as appropriate.
2. Rock climbing destinations are places of special recreational significance and recognized and managed in a way that protects their unique settings.
3. Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
4. LNF planners evaluate existing recreation infrastructure and possible new opportunities for sustainable recreation (trails, trailheads, climbing access, camping sites, etc.) as the Forest Service analyzes and implements forest health and fuel management projects.

Fixed Anchors and Rock Climbing

The Lincoln National Forest affords many exceptional and diverse rock climbing opportunities, and rock climbing is considered an appropriate form of recreation by the USFS. Approximately 30% (about 10,000 climbing sites) of America's climbing resources are managed by USFS, and accordingly rock climbing presents USFS land managers with a unique set of management considerations as a result of activity-specific use patterns and equipment. The climbing user group continues to rapidly grow, and throughout the U.S. land managers collaborate with local climbing communities and national organizations (such as the Access Fund) to steward climbing areas¹² in order to maintain sustainable climbing resources for future generations.

We recommend that the LNF Plan include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity, and the conditional use of fixed climbing anchors as appropriate. The Access Fund and the Forest Service define fixed anchors¹³ as climbing equipment (e.g., bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, and 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 routes, thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor.¹⁴ Fixed anchors, specifically bolts, necessitate long-term

¹² See <https://www.accessfund.org/meet-the-access-fund/our-approach/stewardship-conservation>.

¹³ See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiate

¹⁴ 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. See 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. See also Murdock, E.D. (2010). Perspectives on Rock Climbing Fixed Anchors Through

maintenance.¹⁵ 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.¹⁶ Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts.¹⁷

Access Fund supports management practices that balance resource protection with recreation and climbing access. We suggest that LNF planners include the following language for managing fixed anchors across the forest:

RECREATIONAL CLIMBING.—Nothing in this plan prohibits recreational rock climbing activities in the Forest, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this plan.

This language is in alignment with the Forest Service definition of fixed anchors and best practices for similar public lands.¹⁸

Wilderness Climbing

It is important that the Forest Service is aware of the locations and best practices associated with wilderness rock climbing. These comments are intended to assist the Forest Service in ensuring that climbing access is protected, and appropriate management prescriptions and designations enhance these nationally-significant climbing opportunities.

Climbing is considered an appropriate wilderness activity by the USFS, Bureau of Land Management (BLM) and National Park Service (NPS);¹⁹ however, not all types of climbing activities are suitable within designated wilderness areas. Motorized drills are specifically prohibited in designated wilderness and sometimes (but not necessarily) prohibited in recommended wilderness areas. In general, we support wilderness recommendations where they do not conflict with established climbing areas and/or jeopardize access to climbing

the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California (Unpublished).

¹⁵See

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

¹⁶ Ibid.

¹⁷<https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

¹⁸ 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>.

¹⁹ National Park Service Director's 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).

destinations. Fixed anchors,²⁰ although conditionally allowed in most USFS, BLM and NPS wilderness areas, can be problematic with regard to wilderness management without proper guidance put in place.²¹

The LNF should articulate a clear fixed anchor policy to promote climber safety in wilderness and non-wilderness areas. Fixed anchors are unobtrusive, and typically not visible to forest visitors. Fixed anchors should be permitted across all ROS categories (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary. For more information on fixed anchor technology and best practices visit our best practices resource page.²²

We recommend the following language be included specific to fixed anchor management in wilderness:

RECREATIONAL CLIMBING.—Nothing in this plan prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this plan—

(1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and

(2) subject to any terms and conditions determined to be necessary by the Secretary.

Access Fund and The Wilderness Society have crafted this guidance language together to assist in future management of fixed anchors in wilderness.²³ This language is adapted from and substantially similar to the text passed into federal law through the 2019 John D. Dingell, Jr. Conservation, Management, and Recreation Act, and is the national standard for the treatment of fixed anchors in federal wilderness.²⁴

The LNF has several climbing areas either in currently designated or recommended wilderness. Wilderness climbing on the LNF is in both the White Mountain Wilderness (the Monjeau Peak, Three Rivers, and Eagle Creek climbing areas) and the Capitan Mountains Wilderness (the Sunset Peak climbing area near Arabela). We are happy to provide detailed GIS data for these areas upon request. Furthermore, the following table lists climbing areas that would be placed in recommended wilderness in each of the proposed alternatives. We support wilderness designations as long as the well-established precedent of allowing climbing and appropriate

²⁰ See https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf.

²¹ National Park Service Director's Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012.

²² See <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors>.

²³

<https://www.accessfund.org/news-and-events/news/access-fund-gets-wilderness-climbing-protection-written-into-law>

²⁴ <https://www.congress.gov/bill/116th-congress/senate-bill/47/text>

fixed anchor use is continued in any new recommendations and designations. We can provide additional GIS data on all the sites listed below.

Climbing Areas in Recommended Wilderness by DEIS Alternative

Rec. Wilderness, Draft Plan Alt.	Ranger District	Final ID No.	Unit Acreage	Rock Climbing Site	Crag	Climbing Type	Website	Data Source
Rec. Wilderness: Alt. C	Sacramento RD	SRD48a	15,927	The Tunnel	Shady Side - Far Side Left	Sport	https://www.mountainproject.com/area/105923929/far-side-left	Mountain Project
Rec. Wilderness: Alt. C	Sacramento RD	SRD48a	15,927	The Tunnel	Shady Side - Far Side Right	Sport	https://www.mountainproject.com/area/105923934/far-side-right	Mountain Project
Rec. Wilderness: Alt. C	Sacramento RD	SRD48a	15,927	The Tunnel	Shady Side - Mid-town	Sport	https://www.mountainproject.com/area/105923917/mid-town	Mountain Project
Rec. Wilderness: Alt. C	Sacramento RD	SRD48a	15,927	The Tunnel	Shady Side - Shady Side Left	Sport	https://www.mountainproject.com/area/105923914/shady-side-left	Mountain Project
Rec. Wilderness: Alt. C	Sacramento RD	SRD48b	52,700	Misc. West Slope Limestone		Sport		Access Fund
Rec.	Smokey	SBD39	29	Monjeau	The West	Boulder	https://w	Mountain

Wilderness: Alt. B, C, D, E	Bear RD			Peak	Faces - No Way Out Boulder		ww.moun tainprojec t.com/are a/117578 627/no-w ay-out-bo ulder	Project
Rec. Wilderness: Alt. B, C, D, E	Smokey Bear RD	SBD39	29	Monjeau Peak	The Fin Boulder	Boulder	https://w ww.moun tainprojec t.com/are a/117108 113/the-fi n-boulder	Mountain Project
Rec. Wilderness: Alt. B, C, D, E	Smokey Bear RD	SBD39	29	Monjeau Peak	The Legos	Boulder	https://w ww.moun tainprojec t.com/are a/114277 535/the-le gos	Mountain Project

Cultural and Historic Resources

We strongly support any efforts to safeguard cultural and archaeological resources and Indigenous sacred sites. The draft plan contains provisions to limit climbing at sites eligible for listing in the National Register of Historic Places, such as rock shelters. We support this provision so long as any regulations are well-substantiated and necessary for the safeguarding of critical resources. Any such regulations should be highly site-specific and limit recreational opportunities to the minimum degree necessary to protect cultural and historic sites.

Raptors

Rock climbing formations may share habitat with peregrine falcons and other nesting raptor species. Raptor nest sites can be managed to balance recreational and rock climbing access while protecting nesting activity. Biologists have conducted extensive research on management of nesting raptors and rock climbing.²⁵ We suggest additional guidelines be added to the LNF plan to clarify future management of cliff habitat where rock climbing and nesting activities may overlap. Closing specific climbs or sections of cliff within the immediate vicinity of an active nest

²⁵ <http://www.climbingmanagement.org/issues/wildlife>

protects nesting raptors and minimizes public use restrictions. However, research²⁶ has found that the size of the closure should depend on the reactions of the birds to climbers, and is influenced by the topography of the cliff.

Access Fund, in collaboration with raptor monitor Greg Orton, Hawkwatch International, the US Fish and Wildlife Service, and the North Carolina Game Commission, recently released a comprehensive handbook on managing raptors in climbing areas that makes use of the most recent available science and contains extensive best practices for climbers and land managers alike. The handbook is available for free here:

<https://www.accessfund.org/open-gate-blog/access-fund-releases-comprehensive-climbing-raptor-management-handbook>.

Bats

Caving and rock climbing are two separate activities and generally separate user groups. Climbers enter bat habitat to recreate and could possibly spread white nose fungus on soft goods if they do not follow proper decontamination protocol between caves. Climbers rarely go past the drip line of a cave and should not be grouped as similar activity to caving. Currently there is little to no scientific studies that correlate climbing activities to disturbance of bat habitat and or the spread of disease. Access Fund is partnering with the group Climbers for Bat Conservation²⁷ to collect data on climber interactions with bats. Language in the plan should separate climbing activities from caving and mine exploration, as they are very different activities and use patterns. Access Fund and Climbers for Bat Conservation have developed educational material for climbing specific interaction in bat habitat.²⁸ We suggest the following language be added to the plan to address potential interactions between climbers and bat habitat.

To prevent the spread of disease, rock climbers should not mix climbing and caving equipment. White nose syndrome can be unintentionally spread by climbers if gear has been used in contaminated environments (like caves or mines).

Special Use Permit Authorization

We support the continued issuance of outfitter and guide special use permits for facilitated outdoor recreation activities on the Forest. Outfitters and guides help to educate the public on best practices for climbing on public lands including Leave No Trace principles and safety practices. We recommend the authorization of new and existing outfitting and guiding activities when capacity exists and the uses are consistent with desired conditions for the area.

Economic Benefits of Climbing

²⁶ Camp, Richard J., David T. Sinton, and Richard L. Knight. 1997. Viewsheds: a complementary management approach to buffer zones. In *Wildlife Society Bulletin* Vol. 25, No. 3 (Autumn, 1997): 612-615.

²⁷ See <https://www.climbersforbats.colostate.edu/>.

²⁸ See <https://www.accessfund.org/open-gate-blog/climber-can-help-save-bats>.

Recreation-based tourism boosts local economies near National Forests across the United States. Rock climbing participants continue to grow in proportion to other recreation user groups and it is likely that public demand for activities such as rock climbing will increase relative to other outdoor activities in the near future. In fact, several recent economic studies indicate the benefits of climbing on local communities.²⁹ The Red River Gorge located in the Daniel Boone National Forest, Kentucky recently published an economic impact study citing, visitation to the Forest for rock climbing brought \$3.6 million dollars into the region in one year.³⁰ We ask that the LNF acknowledge the economic contributions of rock climbing when evaluating the Forests socioeconomic impact on local communities, and consider that information when identifying potential projects. We encourage the USFS to partner with local climbing organizations to collect economic data related to climbing, in order to better evaluate the economic impact of climbing on the forest.

Diversity, Equity, and Inclusion

Access Fund encourages the Forest to consider the needs of marginalized and underrepresented communities as they finalize the Plan and DEIS. Access to our public lands and outdoor spaces is a right that all Americans should be able to enjoy, regardless of their background. With many prime recreation destinations within day-trip distance of several major, diverse population centers, the Lincoln National Forest has a powerful opportunity to connect communities that have traditionally been less present on our public lands to exceptional recreation resources.

Summary of Recommendations

Recreation management should recognize and identify rock climbing throughout the Forest Plan as a legitimate wilderness and non-wilderness activity. Managers should also recognize the conditional use of fixed climbing anchors as appropriate. The growth in general recreation and climbing means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the National Forest. Though climbing is a relatively low impact activity that can be managed sustainably, there continues to be a need to partner with local climbers to maintain existing recreation infrastructure and possibly implement new opportunities for sustainable recreation (trails, trailheads, climbing access, camping sites, etc.). The Forest Service should prioritize working with local governments and communities, recreation user groups, and other nonprofit or non-governmental entities to fund, develop and maintain sustainable multi-use areas within the Forest.

Many of the existing climbing areas within the Forest use fixed anchors left in place to facilitate ascent or descent of technical terrain. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to the climbing community. Climbing resources in the LNF provide the public with unique opportunities to experience primitive, human-powered recreation in beautiful settings. The Access Fund maintains that rock climbing is an appropriate

²⁹ <https://www.jstor.org/stable/10.5406/jappastud.25.2.0184>

³⁰ <https://sociology.eku.edu/insidelook/maples-and-bradley-release-2020-red-river-gorge-climbing-study>

activity across the Forests and all ROS categories, and urges the Forest to reopen Last Chance Canyon to appropriate new route development where doing so does not risk harm to cultural and historic resources.

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 LNF may require to provide for the outstanding opportunities found on the Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program³¹ or assistance from our Conservation Team³² 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 draft Plan and DEIS. 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. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772) or email (katie@accessfund.org and taimur@accessfund.org) to discuss this matter further.

Best Regards,



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Bryan Pletta, New Mexico Climbers Resource and Advocacy Group

³¹ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

³² See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.