



Protect America's Climbing



September 20, 2023

Attn: Project Manager Brad Higdon
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Submitted via:

<https://eplanning.blm.gov/eplanning-ui/project/2024165/595/8003899/comment>

RE: Rio Grande del Norte National Monument RMP/EA Scoping

The Access Fund and New Mexico Climbers Resource Advocacy Group (NM CRAG) welcome this opportunity to provide input in the planning process for Rio Grande del Norte National Monument RMP/EA Scoping. This planning area contains some of the most scenic, accessible and important rock climbing in New Mexico. Our members regularly climb within the Rio Grande del Norte National Monument (the monument) and we have provided climbing management comments and community outreach throughout this planning area for several years to assist the Bureau of Land Management (BLM) to ensure the appropriate management of the climbing resources found within this monument.

Access Fund

The Access Fund is a national advocacy organization whose mission is to lead and inspire the climbing community toward sustainable access and conservation of the climbing environment. A 501(c)(3) non-profit supporting and representing over 7 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 20,000 members and 130 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management.¹

¹ See:

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

NM CRAG

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 Rio Grande del Norte National Monument (the monument) was established to protect significant prehistoric, historic, geologic, and recreation interests. Our organizations have been supportive of this monument designation. The monument offers a diverse range of recreational opportunities including rock climbing. Rock climbing occurs in the Rio Grande Gorge, Orilla Verde, Wild Rivers Rim and Taos Box Special Management Recreation Areas (SMRAs) and has been taking place since the 1960's. The existing Taos Resource Management Plan from 2012 also recognized climbing as an appropriate activity.² In the revised environmental assessment (EA) rock climbing and placement and replacement of fixed anchors should continue to be allowed within these SRMAs and within the broader monument.

Fixed Anchor Management

The Taos Resource Management Plan recognizes climbing as an appropriate activity and states: *'Installation of new rock climbing routes or hardware will require pre-approval by the BLM.'*³ The Taos BLM Field Office never set up this approval process to develop new routes within the monument. Our organizations have worked with the Taos BLM staff for over a decade to establish a process that both protects the resource and allows for rock climbing and the placement and replacement of fixed anchors in the monument.

We recommend the revised monument plan include provisions that recognize rock climbing as a legitimate activity and the conditional use of fixed climbing anchors as appropriate. Fixed anchors are 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. Fixed anchors, specifically bolts, necessitate

² Taos Resource Management Plan. 2012. Pg. 55, 72

³ Taos Resource Management Plan. 2012. Pg. 55

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

The use of fixed anchors is permitted on BLM land. There is no CFR within the BLM that prohibits the use of fixed anchors on BLM land. There is ample precedent set for the allowance⁴ of fixed anchors on BLM land. The BLM has a policy specifically allowing the use of fixed anchors in wilderness.⁵

The BLM Instruction Memorandum No. 2007-084, Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM, recognizes that climbing is a legitimate and appropriate use of BLM Wilderness Areas, and that *“climbing, including the use of fixed anchors, has a history that predates the Wilderness Act, and Wilderness Areas represent a unique resource.”*

In July 2012, the BLM released the revised BLM Manual 6340 concerning the management of designated wilderness areas. This new manual essentially codified the underlying elements of Instruction Memo 007-084, which remains relevant guidance for BLM planners. BLM Manual 6340 states that in designated wilderness *“authorizations may be appropriate for ... allowing the placement of permanent, fixed climbing anchors” but that the BLM will “not authorize the public to install permanent, fixed anchors using motorized equipment.”*

Furthermore the S.47 John D. Dingell, Jr. Conservation, Management, and Recreation Act⁶ includes language that allows for the conditional placement and maintenance of fixed anchors within the Emery County Public Land Management Act, which is a component of the bill:

“(b) RECREATIONAL CLIMBING.—Nothing in this Act 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 Act—

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

⁴ Top BLM Recreational Climbing Opportunities

<https://www.arcgis.com/apps/MapSeries/index.html?appid=b93776dfd8be42d190ef90ac53df2121>

⁵ <https://www.blm.gov/policy/im-2007-084>

⁶ <https://www.congress.gov/bill/116th-congress/senate-bill/47>

(2) subject to any terms and conditions determined to be necessary by the Secretary.⁷

These examples show that the BLM has addressed the appropriate use of fixed anchors in wilderness areas which offer some of the highest levels of land protection and management. The BLM should articulate a clear fixed anchor policy to promote climber safety in the monument. Fixed anchors are unobtrusive, and typically not visible to BLM users, especially when camouflaged. Fixed anchors should be allowed throughout the monument (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary.

The continued use and maintenance of fixed anchors is essential to preserving the outstanding recreational value of the monument. The placement and replacement of fixed anchors can be done in a way that minimizes user impact and appropriately balances environmental, cultural, and recreational needs. We suggest the following principles be included in the management plan:

- Do not require an authorization process for the replacement of old or dangerous fixed anchors. Replacing a worn-out fixed anchor often requires little to no new impact to the rock and is necessary for the safety of climbers. Local climbers should be able to replace such anchors at will.
- Recognize power drills as an appropriate and practical tool for placing and maintaining fixed anchors in the front country (non-wilderness areas).
- Work closely with the local climbing community to develop a set of standards and guidelines for the appropriate placement of new fixed anchors in the monument. This should include considerations such as rock quality, route quality, proximity to other routes, proximity to roads, proximity to sensitive natural and cultural sites, need for additional routes in a given area, camouflaging bolts, and historical standards/ethics, among others.

Natural Resource Protection

Climbers are very much an environmentally-minded group. A widespread commitment to conservation, extremely high compliance rates for seasonal raptor closures, and many hours of volunteer time devoted to stewardship all attest to the desire climbers have to protect the places they love to climb in. As such, we strongly support appropriate measures to safeguard flora and fauna from recreational impacts. Doing so falls in a spectrum from general education about Leave No Trace practices to targeted closures of sensitive areas. We support site specific management based on quantifiable surveys and data, and are happy to work with the BLM on devising management strategies and communicating regulations to the climbing community.

⁷ <https://www.congress.gov/bill/116th-congress/senate-bill/47>

Access Fund has published a handbook on raptor management.⁸ The handbook is the result of years of effort to compile every relevant article related to managing recreation, specifically climbing, in raptor habitat, and it includes a 20 page reference list in Appendix A (a living document that is linked to the handbook). The handbook was reviewed and edited by Hawkwatch, UFWS, and NC Wildlife Resources Commission. It represents the latest knowledge base and mitigation models for protecting raptors. We suggest that BLM utilize the most current, science-based models for protecting nesting raptors.

Access Fund and NM CRAG Assistance

Access Fund and NM CRAG are ready and willing to partner with the BLM to develop a management plan that allows for the continued activity of rock climbing within the monument. We strongly support the protection of cultural and natural resources and rock climbing can coexist with these values. As advocacy organizations, we work hard to educate climbers, minimize impacts, create proactive stewardship opportunities, and work collaboratively with other user groups.

It is important to establish and designate well built trails, in climbing areas that receive higher use levels. Established trails serve many beneficial purposes in managing and limiting impacts from climbing. Such trails can prevent erosion, route climbers away from sensitive resources. Access Fund's Conservation Team and Stewardship Program⁹ is available to assist BLM staff in stabilizing and establishing trails in well used areas.

Rock climbing impacts differ from other user groups and tend to have quite different behavior profiles, and management strategies should therefore be unique, adaptive and site-specific for diverse user-groups. For example, the impact climbers have is fairly concentrated and predictable: focused around camping areas, parking areas, approach trails to cliffs, and the base and walls of the crags themselves. ATV and hiker user impacts tend to spread wider on the landscape. We look forward to working with the BLM to identify and manage site-specific concerns that BLM staff may have.

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<https://d1w9vyym276tvm.cloudfront.net/assets/Access-Fund-Raptor-Handbook.pdf?mtime=20210603122128&focal=none>

⁹ <https://www.accessfund.org/capabilities/stewardship-conservation>

Thank you for your consideration of these comments on the Rio Grande del Norte National Monument RMP/EA Scoping. The Access Fund and NM CRAG have the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the monument. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in black ink that reads "Katie Goodwin". The signature is written in a cursive, flowing style.

Katie Goodwin
Policy Analyst
The Access Fund

Cc:

Erik Murdock, Access Fund, Policy Director, Interim Executive Director
Bryan Pletta, New Mexico- Climbers Resource and Advocacy Group