



Protect America's Climbing

September 21, 2012

Mr. Jim Mahoney  
Bureau of Land Management  
1763 Paseo San Luis  
Sierra Vista, Arizona, 85635  
[TFOWEB\\_AZ@blm.gov](mailto:TFOWEB_AZ@blm.gov)

**RE: Access Fund Comments for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness - Draft Wilderness Management Plan and Environmental Assessment**

Dear Mr. Mahoney,

The Access Fund appreciates this opportunity to comment on the Draft Wilderness Management Plan and Environmental Assessment proposed for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness. Both Wildernesses provide world-class climbing opportunities and we appreciate that climbing is acknowledged as a historical and appropriate use of the Baboquivari Peak Wilderness and Coyote Mountains Wilderness. The Access Fund can provide climbing management expertise, funding, and community outreach to assist the Bureau of Land Management manage climbing within the Baboquivari Peak Wilderness and Coyote Mountains Wilderness.

### **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 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.<sup>1</sup> Arizona is one of our larger member states and many of our members regularly travel to climb in Arizona. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## **COMMENTS**

### **Wilderness Climbing and Fixed Anchors**

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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)

The use of fixed anchors is a significant need for climbers and sometimes a concern for land managers, especially in designated wilderness areas. Since 1989, the Access Fund has been working with all of the federal agencies to resolve the issue of how fixed anchors should be managed in wilderness. We also have negotiated directly with land managers and the environmental community to achieve broad support for a national policy which allows, but limits, the use of fixed anchors in wilderness. The Access Fund believes:

- Some level of fixed anchor use must be allowed wherever climbing is allowed. The appropriate level of use should be established on an area-by-area basis. Surveys of the climbing community show that the vast majority of climbers support this position.
- Climbers, not the government, should bear the responsibility for determining when to place safety anchors and how to use these tools.
- The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. The continued use of fixed anchors, if properly managed, will not degrade wilderness resources and values.
- Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited.
- The Access Fund supports the ban on power drills in wilderness, and actively promotes the concept that in wilderness bolts are a "tool of last resort."

In 1996, the Sawtooth National Forest Supervisor made a controversial decision to prohibit the placement of new fixed anchors in the Sawtooth Wilderness. The Access Fund immediately appealed the decision, and the Forest Service responded by instituting a negotiated rulemaking process to clarify national policy about fixed anchor use in wilderness areas. In 2000, the Secretary of Agriculture established a negotiated rulemaking committee called the *Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee* (the Negotiated Rulemaking Committee). The Negotiated Rulemaking Committee comprised of 23 stakeholders including the Access Fund, Forest Service, National Park Service (NPS), Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (FWS) was formed to develop recommendations for a proposed rule regarding fixed anchors in designated wilderness.

The Negotiated Rulemaking Committee reached the following consensus:<sup>2</sup>

- Bolt-intensive climbing is generally incompatible with wilderness.
- Leave-no-trace or clean-climbing ethics should be integrated into a rule.
- Via a climbing management plan, the limited use of fixed anchors should be allowed.

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<sup>2</sup> See <http://www.fs.fed.us/t-d/pubs/htmlpubs/htm01232826/page03.htm>

- Crafting a rule allowing fixed anchor use in wilderness is permissible under the Wilderness Act.

The Forest Service has yet to propose a rule or policy regarding fixed anchor use in wilderness. However, in January 2011, the National Park Service released a draft version of Director's Order 41 *Wilderness Stewardship* (DO 41) for public review.<sup>3</sup> Director's Order 41, Section 7.2 *Climbing*, reflects the consensus reached by the Negotiated Rulemaking Committee for managing fixed anchors in wilderness. Subject to a few concerns,<sup>4</sup> the Access Fund generally supports the policy espoused by DO 41.

The BLM is the only federal agency that implemented the Negotiated Rule Making Committee's recommendations in the *BLM Part II Final Rule 43 CFR 6300 and 8560 Wilderness Management* (the "Final Rule"). The fixed anchor policy within the Final Rule (no-power drills) is sufficient to manage climbing within Baboquivari Peak Wilderness and Coyote Mountains Wilderness. Should the need arise to develop a more detailed climbing management plan, planners can use examples such as Yosemite, Denali, Rocky Mountain, and Black Canyon of the Gunnison National Parks when crafting more specific wilderness climbing management strategies that accommodate climbing and protect wilderness values. Each of these National Parks is a world-renowned climbing destination that has experience successfully managing climbing in designated wilderness and may be useful references for developing additional climbing management policies.

### ***Climbing and Cultural Resources***

The Access Fund advocates for land management policies that support climbing access and conservation of public lands. We believe in protecting cultural resources and Native American heritage, and recognize that public land managers must balance recreational access with resource protection which sometimes may include restrictions to protect cultural resource values. The Access Fund supports management decisions based on a thorough understanding of public use patterns and their effects on known and identifiable cultural resources. The use of baseline data and public involvement (with due regard to the protection of confidential tribal information) is critical to making informed management decisions that protect these resources and allow public access. The Access Fund Climbing Preservation Grant Program provides funds for research, monitoring, educational outreach, and stewardship projects at climbing areas around the country. Specific climbing management related components of this Draft Plan may be appropriate for Access Fund grant support. The Access Fund and local climbers can provide volunteers, funding, educational outreach and local expertise.

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<sup>3</sup> See <http://www.nps.gov/policy/DO-41draft.pdf>

<sup>4</sup> See

[http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS\\_Directors\\_Order41\\_Comments\\_3.10.2011.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_Directors_Order41_Comments_3.10.2011.pdf)

Best management practices are well established regarding climbing access and cultural resource protection. The Access Fund supports protective measures that minimize access restrictions, including posting appropriate educational information about the resource, constructing physical barriers to protect specific locations, and limiting climbing within an appropriate buffer around a discrete cultural resource site. Regarding sacred sites with no discrete cultural resources, the Access Fund supports clear management policies that accommodate ceremonial use of Native American sacred sites and avoid adverse effects to the site's physical integrity. The Access Fund opposes landscape-scale closures or restrictions for sacred site protection based solely on religious preferences where specific cultural resources are not present or may be protected by other means. The Access Fund supports voluntary limits on climbing on or around designated sacred sites in conjunction with public educational efforts concerning the sensitivities of these locations. The Access Fund can help educate climbers about the area's cultural significance and the appropriate use.

### **Access Fund Assistance**

Please contact us for assistance developing a climbing management plan for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness. 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>5</sup> The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>6</sup> or assistance from our Conservation Team<sup>7</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 climbing management for the Baboquivari Peak Wilderness and Coyote Mountains Wilderness. The Access Fund has the experience, local contacts, and resources to help planners craft policy that encourages climbing while protecting wilderness values. 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 (303-545-6772 x113) or email ([rd@accessfund.org](mailto:rd@accessfund.org)) to discuss this matter further.

Best Regards,

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<sup>5</sup> See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

<sup>6</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>7</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).



R.D. Pascoe  
Policy Director  
The Access Fund

Cc: Brady Robinson, Access Fund, Executive Director  
Scott McNamara, Access Fund, Regional Coordinator