



Protect America's Climbing

September 7, 2016

Texas Parks and Wildlife

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Fredericksburg, TX, 78624

Submitted Via Email: enchantedrockclimbers@tpwd.texas.gov

Texas Parks and Wildlife,

The Access Fund welcomes this opportunity to comment on Enchanted Rock State Natural Area DRAFT Climbing Management Plan. Enchanted Rock offers a unique opportunity for rock climbing in Texas. Rock climbing at Enchanted Rock dates back to the 1930's and continues to draw large numbers of climbers today. Access Fund appreciates the long standing working relationship between the Central Texas Climbers Coalition (CTCC) and Texas State Park. This climbing management plan could influence future climbing management throughout the state of Texas, Access Fund offers these comments with the intention of supporting a sustainable climbing management plan (CMP) for Enchanted Rock State Natural Area (SNA).

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 13,000 members and 100 affiliates. 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.

COMMENTS

Purpose

The purpose and need for the DRAFT CMP is well defined: to protect natural and cultural resources, and provide a ‘*sustainable platform for the management of rock climbing activities at Enchanted Rock*’.¹ We recommend that the valuable and historic climbing resources, in addition to the cultural and natural resources, be specifically listed as a value to protect and manage at Enchanted Rock. The high quality climbing experience Enchanted Rock offers is a valuable resource worthy of protection. In addition high levels of climber visitation generate revenue for the Park and provide economic benefits to the surrounding community. We suggest further research be conducted and citations be provided for the numerous statements made throughout the document referring to visitor use patterns² and impacts to resources³ at Enchanted Rock SNA.

Closures and restrictions

The DRAFT CMP gives an excellent history of Enchanted Rock SNA. To further clarify the proposed *top-rope* and *bolt free zones* we suggest listing all areas in an appendix, instead of the CMP body, which can easily be updated if zones change. In addition we suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. We suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status.

Permits

The permit process to place fixed anchors is well thought out but somewhat complicated to follow. We suggest making permit applications, and first ascent registration available online to ease the documentation and application process. We also suggest compiling a simple handbook or kiosk display with photos and descriptions of natural and cultural resources a climber could encounter and should avoid. This educational material could be beneficial for all climbers as well as developers.

Hardware Standards

We recommend fixed anchors be clearly defined, ‘*Fixed anchors, defined by the Access Fund and other Federal land managers, 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.*’⁴ We suggest specific hardware standards be outlined either in the CMP or a

¹ Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 1.

² Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 6,8,10.

³ Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 11.

⁴ https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf

subsequent fixed hardware handbook. Further clarification and a definition for ‘*soft hardware*’⁵ should be included in the CMP. It is important to require fixed anchors adhere to current best available technology and practices to ensure quality and safety. For more information on bolting best practices and suggested hardware visit the Access Fund’s Fixed Anchor Resource Center at: <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors>.

Non Commercial and Commercial Group Use

We suggest clear guidelines be developed to manage large groups at Enchanted Rock. Guided groups can be an excellent introduction to rock climbing but should be managed in a way that protects resources, resolves user conflict and allows for appropriate group use.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help the Texas State Parks improve trails and staging areas around climbs as well as other management needs. Local climbing communities like the CTCC have a long history of positive environmental stewardship and collaboration with other organizations to protect this wonderful, highly-valued resource. Access Fund strives to work with local climbers and land managers to address management needs, we provide training on planning and stewardship best practices to keep climbing areas healthy. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program⁶ or assistance from our Conservation Team⁷ which helps maintain climbing areas throughout the United States.

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⁵ Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 12.

⁶See: <https://www.accessfund.org/take-action/apply-for-a-grant>

⁷ See: <https://www.accessfund.org/meet-the-access-fund/our-approach/local-support-mobilization>

Thank you for your consideration of these comments on the Enchanted Rock DRAFT Climbing Management Plan. The Access Fund has the experience, local contacts, and resources to help planners craft plans that encourage climbing while sustaining the health and integrity of the State Parks and Natural Areas. The Access Fund looks forward to participating throughout the planning process. Please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the staff to seek input from diverse groups and interests in response to the proposed climbing management plan. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in black ink, appearing to read "Katie Goodwin". The signature is written in a cursive, flowing style.

Katie Goodwin

Access Fund-Public Lands Associate

Cc: Brady Robinson, Access Fund, Executive Director

Erik Murdock, Access Fund, Policy Director