



Protect America's Climbing

November 28, 2012

Prescott National Forest  
Attention: Plan Revision  
344 South Cortez Street  
Prescott, AZ 86303  
[prescott-forest-plan-comments@fs.fed.us](mailto:prescott-forest-plan-comments@fs.fed.us)

**RE: Access Fund Comments on the Draft Environmental Impact Statement and Draft Land Management Plan Proposed for the Prescott National Forest**

Dear Forest Planning Team,

The Access Fund welcomes this opportunity to comment on the *Draft Environmental Impact Statement* (Draft EIS) and *Draft Land and Resource Management Plan for the Prescott National Forest* (Draft LMP).<sup>1</sup> Climbing is a historic and continuing use of the Prescott National Forest<sup>2</sup> which provides climbing routes that range from single-pitch sport climbs to multi-pitch wilderness adventures. Granite Mountain is one of Arizona's premier traditional climbing areas with rock quality second to none.<sup>3</sup> The Access Fund is committed to assisting planners by providing climbing management expertise, resources, and community outreach.

**Access Fund**

Access Fund is the only 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—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>4</sup> Arizona is one of our larger member states and many of our members regularly travel to climb in the Prescott National Forest. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

**COMMENTS**

Two concerns stand out with regard to climbing management within the Draft LMP. First, the prohibition against “new fixed anchor climbing routes” within Granite Mountain Wilderness is unnecessary. Second, the current seasonal closure of the entire Granite Mountain climbing area

from February until July regardless of raptor nesting activity or location is overly broad, unnecessary, and out of line with other raptor programs in place around the country.

### **History of Managing Fixed Anchors in Wilderness**

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 the Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee comprised of 23 stakeholders including the Access Fund, US Forest Service (USFS), National Park Service (NPS), Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (FWS) to develop recommendations for a proposed rule regarding fixed anchors in designated wilderness. The Negotiated Rulemaking Committee generally agreed on the following approach for managing wilderness fixed anchors:<sup>5</sup>

- Crafting a rule allowing fixed anchor use in wilderness is permissible under the Wilderness Act.
- Bolt-intensive climbing is generally incompatible with wilderness.
- Leave-No-Trace and “clean climbing” ethics should be integrated into a rule.
- Through a climbing management plan the limited use of fixed anchors should be allowed.

The BLM was the first to incorporate the Negotiated Rulemaking Committee’s findings into a national policy: BLM Instruction Memorandum No. 2007-084-Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM.<sup>6</sup> Indeed, Instruction Memo No. 2007-084 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.”<sup>7</sup> While the US Forest Service is still working on a national rule or policy<sup>8</sup> regarding fixed anchor use in wilderness, in January 2011 the National Park Service released a draft version of Director’s Order #41 on Wilderness Stewardship (DO 41)<sup>9</sup> including a section on climbing which reflects the agreement reached by the Negotiated Rulemaking Committee for managing fixed anchors in wilderness. Subject to a few concerns,<sup>10</sup> the Access Fund generally supports the policy for managing fixed anchors in wilderness adopted by BLM Instruction Memo No. 2007-084 and proposed in the NPS’s DO 41.

Concerns regarding fixed anchor use in Granite Mountain Wilderness can be ameliorated with proper management. Existing management strategies in use around the country successfully conserve climbing access while preserving wilderness characteristics. BLM Instruction Memorandum No. 2007-084 and DO 41 provide an effective framework for managing fixed anchor use in Granite Mountain Wilderness, and planners can utilize the proven wilderness climbing management plans and policies of Rocky Mountain,<sup>11</sup> Zion,<sup>12</sup> and Yosemite<sup>13</sup> National

Parks as models for Granite Mountain Wilderness. Each of these National Parks is a world-renowned climbing destination that has experience successfully managing climbing and preserving wilderness characteristics. Each of these plans provide “programmatic” (as opposed to case-by-case permitting) guidance for placing new and re-placing existing fixed anchors without arbitrary bolting standards or complex permitting processes.

One of the most significant and effective wilderness climbing management plans in the country is found at Rocky Mountain National Park. That park’s backcountry plan directs that fixed anchors should be tools of last resort, but may be appropriate when necessary:

[T]o enable a safe rappel when no other means of descent is possible. The infrequent placement of new fixed anchors is allowed when ascending a route to connect terrain that is otherwise protected by removable anchors...or when there are no features which will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during the ascent (e.g., traditional face climbing).<sup>14</sup>

We encourage planners to consult with these parks to better understand how successful these basic policies have been at these popular wilderness climbing areas.

### **Minimum Tool**

We believe that when placed by hand on rare occasions, climbing fixed anchors are a “minimum tool” necessary for the administration of wilderness recreation. Some practices related to fixed anchors outside of wilderness, however, are not the “minimum tool.” For example, power drills are banned by the Wilderness Act and removable bolts are unproven and likely impractical, thus both of these practices are clearly not an acceptable minimum tool for managing fixed anchors in Granite Mountain Wilderness. The minimum tool required to safely and successfully place fixed anchors in Granite Mountain Wilderness is a hand drill, which necessitates a higher degree of both skill and difficulty. Thus, requiring this arduous hand-drilling method will limit the proliferation of new bolts yet still allow a minimum number for the administration of unrestrained wilderness climbing within Granite Mountain.

### **Specific Management Recommendations for Granite Mountain Wilderness Fixed Anchors**

We believe that the following are key components for effectively managing fixed anchors in Granite Mountain Wilderness, which are consistent with successful management by other federal wilderness managers, will preserve the wilderness character of Granite Mountain, and will provide opportunities for solitude through primitive and unconfined recreation without overly-complicated and arbitrary permitting standards:

- Allow hand-drilling only, which naturally limits the use of fixed anchors.

- Allow new fixed anchors placements, subject to programmatic approval, to improve climbers' safety on sections of routes and descents where the use of removable hardware is not feasible.
- Allow for increased regulation, restrictions, and/or require case-by-case approval for placing new or replacing existing fixed anchors based on the demonstration of unacceptable impacts which are caused by or associated with fixed anchor use.
- Promote a Leave-No-Trace/Clean Climbing Ethic under which bolt intensive (i.e. sport climbing) routes are generally considered an incompatible use of Granite Mountain Wilderness.
- Allow replacing existing fixed anchors without a permit for safety reasons.
- Allow for climbing and fixed anchor restrictions based on Forest Service standards<sup>15</sup> to be imposed to protect natural and cultural resources, visitor safety, and wilderness characteristics.
- Avoid overly complicated permitting processes, arbitrary bolting standards, and excessive management.

### **Climbing and Cliff Nesting Raptors**

The Access Fund manages the largest crowd-sourced list of wildlife-related climbing closures in the country.<sup>16</sup> We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country.<sup>17</sup> In many cases, climbers actively assist<sup>18</sup> by maintaining trails, removing trash,<sup>19</sup> and participating in the locating, monitoring, and reporting on species of concern.<sup>20</sup> The Access Fund has the experience, expertise, and resources to assist planners develop management policy that protects wildlife and maximizes recreational access.

Climbers care deeply for the places they climb and for the opportunity climbing affords to interact with the natural world. Watching a peregrine or a golden eagle effortlessly soaring on a thermal is often more memorable than the climb itself. It is the wildlife and natural beauty of places like Granite Mountain that attract climbers, and protecting an area's ecology is central to conserving the climbing experience. Climbing is a low impact activity that managed properly poses no threat to cliff dwelling raptors, such as golden eagles or peregrine falcons. A combination of seasonal buffers, based on credible evidence, monitoring/data collection and expert participation can protect raptors and keep public access restrictions to a minimum. The Access Fund and local climbers have the interest, resources, and experience to assist the Forest Service design and to implement an effective management plan for protecting raptors nesting in the Prescott National Forest. We also have national experts willing to provide scientific evaluation of data and comments.

### *Seasonal Restrictions*

Generally, seasonal closures to protect raptors run from February and can last until August. The size, location, and length of a closure can vary each year based on nest location and success or failure of the hatch. Smith Rock State Park is a world renowned climbing destination in Oregon where golden eagles successfully nest regularly. As an example, this year's closure at Smith Rock began February 15<sup>th</sup> and is in place through August 1<sup>st</sup>, but continued monitoring can allow the area to re-open earlier, once the eaglets have fledged or if the nest does not take.<sup>21</sup> A management strategy for Prescott National Forest should roughly follow the same time frame and ongoing monitoring can provide important data that allows the closure to be re-opened or re-shaped based on the location and status of any active nest(s). If no nesting occurs or a nest fails, the area can be re-opened. Similarly, a closure can be lifted early following a successful fledge. Either way, continued monitoring minimizes access restrictions and provides valuable information regarding raptors in the area.

### *Buffer Zones*

Prescott National Forest contains multiple smaller crags, such as Swamp Slabs, many of which could remain open depending on nest location. Developing tailored site-specific buffer zones based on the topography and location of any active nest(s) is a successful strategy used at other locations around the country. In such a setting, closing an entire area from February through July is unnecessary and overly broad. Closing specific climbs or sections of cliff within the immediate vicinity of an active nest protects nesting raptors and minimizes public use restrictions. Local climbers from the Prescott Climber's Coalition are willing to provide volunteers to assist with monitoring of the area.

### *Monitoring/Data Collection and Expert Participation*

It is our understanding that no regular monitoring of nesting raptors occurs in the Prescott National Forest. Thus, failed nest sites are never visited to investigate potential causes and no good data exists regarding raptor use of the area. Several human-caused and natural factors (totally unrelated to human activity) can lead to nest failure (such as: lead poisoning, shooting, transmission line/wind turbine collisions, parasites, poisons, egg predation, loss of a parent, etc...). Evaluating potential disturbances of nesting raptors from benign recreational activities, such as climbing, must occur within the larger context of demonstrable (i.e. data supported) causes of raptor mortality and nest failure. Collecting such information and consulting an expert are critical to understanding and rule-out causes of nest failure and developing a management plan focused on conservation without restricting activities that pose no threat to raptors.

## Specific Local Input

The Access Fund works with local climbing organizations across the country.<sup>22</sup> The local climbers are volunteers that donate their time and energy to care for the places they climb. The Prescott Climber's Coalition was formed to help conserve the climbing environment around Prescott, including Granite Mountain. Kevin Keith, Access Fund Central Arizona Regional Coordinator<sup>23</sup> and Prescott Climber's Coalition member, has decades of experience climbing in and around the Prescott National Forest. Kevin submitted the following comments to be included in this comment letter:

As the regional coordinator for the Access Fund and a member of the Prescott Climber's Coalition I would like the Forest Service to further consider the use of permanent fixed anchors in the Granite Mountain Wilderness. The modest addition of fixed anchors to link natural features and secure a belay is not unreasonable. This is a request regarding the wilderness at large. I assure you that hand drilling fixed anchors is self-limiting as it is laborious and is additionally challenging when it is accompanied by a ground up ethic.

I am also requesting consideration of a partial bird closure to the main Granite Mountain crag. The Swamp Slabs are located on the western aspect of the main climbing crag and see little action with regard to nesting peregrines. I recommend keeping this area open year round. Monitoring the nesting pairs and opening other unaffected areas based on the findings is also worth mentioning.

Prescott has a strong tradition of conservation with regard to the climbing resource prior to the implementation of a bolting moratorium or the bird closure mandate. Local climbers imposed a bird closure in the early 90's out of respect to the endangered peregrine. Local climbers limited new route development as well through consensus. We would like to continue this tradition as it relates to fixed anchors and new route development with consideration of all wilderness residents, and other users.

Thank you for your consideration,

Kevin Keith

## Access Fund Assistance

Please contact us for assistance developing a climbing management plan for the wilderness and non-wilderness areas of the Forest. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*<sup>24</sup> and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country. 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>25</sup> or assistance from our Conservation Team<sup>26</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 Prescott National Forest. The Access Fund looks forward to participating throughout the entire planning process and assisting planners to develop management policy that encourages climbing while sustaining the health, diversity and productivity of the Forest. Please keep us informed as this Plan Revision 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,



R.D. Pascoe  
Policy Director  
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director  
Kevin Keith, Access Fund and Prescott Climber's Coalition  
Scott McNamara, Attorney and Tucson Climbing Advocate  
Dave Lovejoy, Prescott College, Outdoor Adventure Program  
Rusty Baillie, Founding Member Prescott Climber's Coalition

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<sup>1</sup> <http://www.fs.usda.gov/detail/prescott/home/?cid=STELPRDB5122002>.

<sup>2</sup> <http://www.fs.usda.gov/activity/prescott/recreation/climbing/?recid=67155&actid=37>.

<sup>3</sup> <http://www.mountainproject.com/v/granite-mountain/105787785>.

<sup>4</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).

<sup>5</sup> <http://www.fs.fed.us/t-d/pubs/htmlpubs/htm01232826/page03.htm>.

<sup>6</sup> [http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2007/im\\_2007-084\\_print.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2007/im_2007-084_print.html).

<sup>7</sup> *Id.*

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<sup>8</sup>The USFS has stated repeatedly their intention to generally follow the outline of the Negotiated Rulemaking Committee findings.

<sup>9</sup><http://www.nps.gov/policy/DO-41draft.pdf>.

<sup>10</sup>[http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS\\_DirectorsOrder41\\_Comments\\_3.10.2011.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_DirectorsOrder41_Comments_3.10.2011.pdf).

<sup>11</sup> See Rocky Mountain National Park Backcountry and Wilderness Plan (2001), [http://www.nps.gov/romo/parkmgmt/upload/alternatives\\_2.pdf](http://www.nps.gov/romo/parkmgmt/upload/alternatives_2.pdf) at 2-40.

<sup>12</sup> See Zion National Park Backcountry Management Plan (2007), <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm>, at 47-49.

<sup>13</sup><http://www.nps.gov/yose/planyourvisit/bolting.htm>.

<sup>14</sup>See Rocky Mountain National Park Backcountry Management Plan (2001).

<sup>15</sup>Such as 50 foot buffers around discrete cultural resource sites and seasonal closures to protect cliff dwelling raptors.

<sup>16</sup> <http://status.accessfund.org>.

<sup>17</sup> [www.climbingmanagement.org](http://www.climbingmanagement.org).

<sup>18</sup> The Access Fund sponsors approximately 130 Adopt a Crag events annually across the country. Adopt a Crag is the Access Fund's signature stewardship program. It exists to unite local climbing communities in partnerships with land managers to conserve local climbing areas. Adopt-a-Crag events typically include activities such as litter clean-ups, trail construction and restoration, erosion control, and invasive weed removal. See <http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000889/k.166C/AdoptaCrag.htm>.

<sup>19</sup> In July 2011, the Access Fund launched a new Conservation Team that will spend ten (10) months a year traveling the country addressing conservation issues. See <http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5000939&ct=11053041>.

<sup>20</sup> *Examples include:* Luther Rock, Lake Tahoe, CA; Pinnacles National Monument, CA; Eldorado Canyon State Park, CO, Jefferson County Open Space, CO; Acker Rock, OR; Trout Creek, OR; Boulder Canyon, CO.

<sup>21</sup> <http://smithrock.com/b2evolution/blog4.php> Arapahoe National Forest in Colorado uses a similar approach.

<sup>22</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000683/k.CE6C/Local\\_climbing\\_organizations.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000683/k.CE6C/Local_climbing_organizations.htm).

<sup>23</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000687/k.6B48/Regional\\_Coordinators.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000687/k.6B48/Regional_Coordinators.htm).

<sup>24</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>.

<sup>25</sup> [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>26</sup> [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).