



July 10, 2013

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**RE: Access Fund and Las Vegas Climbers Liaison Council Comments for the Mt. Charleston Wilderness Management Plan**

Dear Ms. Schumacher and Planning Team:

The Access Fund and Las Vegas Climbers Liaison Council<sup>1</sup> appreciate this opportunity to provide comments on the Forest Service and Bureau of Land Management's (BLM) *Preliminary Mt. Charleston Wilderness Management Plan* (the Plan). Mt. Charleston's immaculate limestone walls offer some of the best wilderness climbing opportunities in the country. Similar to Arrow Canyon Wilderness,<sup>2</sup> Mt. Charleston is a sport climbing venue that requires fixed anchors (i.e. bolts) to climb safely. Generally, the Plan's climbing management policies are reasonable and we are encouraged that the Plan acknowledges climbing as an appropriate and historic use of Mt. Charleston Wilderness. However, we are extremely concerned that it prohibits the placement of all new fixed anchors. Prohibiting new bolts completely is unnecessary and limits the Plan's ability to mitigate impacts to the areas with existing routes and provide solitude and unconfined recreation. As explained in detail below, a permit system to approve new routes is a superior alternative and examples successfully in use across the country can be a model for Mt. Charleston 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. The Access Fund partners with the BLM, Forest Service, National Park Service, and US Fish & Wildlife Service on the national and local levels to provide climbing management expertise, stewardship, project specific funding, and educational outreach. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how

climbing will be managed on federal land.<sup>3</sup> Nevada is one of our larger member states and many of our members from Nevada and around the country regularly travel to climb at Mt. Charleston.

Since 1989, the Access Fund has been working with all of the federal agencies, including the Forest Service, to resolve the issue of how fixed anchors will be managed in designated wilderness. We negotiated directly with land managers and the conservation community to achieve broad support for a national policy which allows, but limits, the use of fixed anchors in designated wilderness. The Access Fund has a long record of conservation and climber activism nationally and at Mt. Charleston. We work closely with local climbers across the country, including the Las Vegas Climbers Liaison Council, to be leaders in developing appropriate policy for managing fixed anchors in wilderness and non-wilderness areas. The Access Fund participated in the Toiyabe National Forest Land & Resource Management Plan Amendment in 1996, which established the climbing management policies currently in use at Mt. Charleston.

In Nevada alone, we have participated in several wilderness planning initiatives including the Lake Mead National Recreation Area Wilderness Management Plan (2010 and 2012), Arrow Canyon Wilderness Management Plan (2010 and 2013), Red Rock Canyon National Conservation Area Wilderness Management Plan (2007), and Red Rock National Conservation Area Wilderness Fixed Anchor Management Plan (2012).<sup>4</sup>

Regarding wilderness climbing and fixed anchor management, the Access Fund believes that:

- Climbing is a low-impact primitive recreational activity that, when managed properly, does not degrade wilderness characteristics.
- 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.
- 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.
- Climbers, guided by clear policy and local ethics, bear the primary responsibility for determining when to place and replace fixed anchors and how to use these tools.
- 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 the use of new fixed anchors is prohibited.

For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## COMMENTS

Mt. Charleston is one of the first “destination” sport climbing venues in the country. Climbers began establishing routes in the 1980s. Approximately, fifteen developed cliffs provide high quality sport climbing and bouldering, in a rugged and steep landscape of canyons and cliffs, surrounded by conifers. Currently there are over 416 existing sport routes ranging from 5.6 to 5.14, with the majority in the 5.10 to 5.12 range. Roughly 51% of the existing routes are within designated Wilderness, including The Hood (100 routes), Mom’s Cave (3), Lee Canyon-Mummy Area (20), The Glass House Canyon (60+), and The Ice House (30+). Non-wilderness climbing accounts for about 49% of the existing routes, including the Blue Sky Bluff (10 routes), Starter

Crag (5), Walla Walla Wash (4), Pirates Cove (8), Angels Falls (10), Cathedral Peak (1), South Loop Walls (10), Imagination Wall - Fast Food Cliff (40+), Little Falls (20+), Universal Wall (30), Mary Jane Cliff (15), and the Robber's Roost (50+).

We applaud the Plan for acknowledging sport climbing as a legitimate use of Mt. Charleston Wilderness and providing reasonable policies for resource protection and bolt replacement. The Access Fund and Las Vegas Climbers Liaison Council stand ready to help educate climbers about the climbing and bolting regulations proposed by the Plan. The Las Vegas Climbers Liaison Council partners with the BLM to help manage bolt replacement in Red Rock National Conservation Area, including in designated wilderness, and are willing to help the Forest Service manage and maintain fixed anchors within Mt. Charleston Wilderness.

Unfortunately, the Plan prohibits the placement of new fixed anchors effectively eliminating the opportunity to develop new climbing routes and reducing the ability to mitigate impacts near existing routes. The Plan states: “Prohibit the installation of new permanent fixed anchors, unless the climbing route is approved to be maintained, in which case replacement bolts are authorized.”<sup>5</sup> While we appreciate the opportunity to access and maintain existing climbs, totally prohibiting new routes is not the best means for protecting wilderness characteristics or to provide solitude and primitive and unconfined recreation. Climbing’s popularity continues to rise and places like Mt. Charleston are going to be used by more climbers. Limiting climbing to existing routes will likely increase impacts to existing routes as more and more climbers visit Mt. Charleston. Allowing some level of new route development will protect wilderness characteristics by dispersing the associated impacts and by providing the opportunity for more primitive and unconfined recreation.

New route permit processes successfully in use at Joshua Tree National Park<sup>6</sup> (CA), New River Gorge National River<sup>7</sup> (WV), Eldorado Canyon State Park<sup>8</sup> (CO), and Rifle Mountain Park<sup>9</sup> (CO) are excellent models for allowing responsible development of new routes at Mt. Charleston. In each location, local climbing organizations work with the land manager to review and ultimately decide which applications should be approved. The Wilderness Act, the National Park Service,<sup>10</sup> and BLM wilderness management policies<sup>11</sup> allow for such a system to be implemented and the Access Fund and Las Vegas Climbers Liaison Council can help develop and implement an effective new route permit system for Mt. Charleston.

### **Fixed Anchors and Wilderness Character at Mt. Charleston**

The Forest Service is required to “[m]anage wilderness to ensure that human influence does not impede the free play of natural forces or interfere with natural successions in the ecosystems and to ensure that each wilderness offers outstanding opportunities for solitude or a primitive and unconfined type of recreation.”<sup>12</sup> Management of recreational uses in wilderness is based on three factors: maintaining solitude, maintaining a primitive setting, and keeping recreation as unconfined as possible.<sup>13</sup> Thus, planners should develop a new route permit process that manages fixed anchors without impairing the wilderness character of Mt. Charleston. In particular, the permit process can consider the range of climbing use patterns and potential impacts to determine whether approving a new route application would comport with the untrammled,

natural, and undeveloped character of Mt. Charleston Wilderness, and provides opportunities for solitude or primitive and unconfined recreation.

FSM 2300 defines *untrammeled* as “[i]n the context of the Wilderness Act, an untrammeled area is where human influence does not impede the free play of natural forces or interfere with natural processes in the ecosystem.” Fixed anchor use, other than sometimes preventing impacts to cliff top ecologies, does not control or manipulate ecological systems in wilderness. Thus, climbing activities and a responsible use of fixed anchors will not affect the untrammeled character of Mt. Charleston Wilderness.

The Wilderness Act requires that wilderness be “protected and managed so as to preserve its *natural* conditions.” As with “untrammeled,” the new route permit process will have no effect on ecosystems and ecological processes in Mt. Charleston Wilderness (other than mitigating potential related climbing impacts), and thus the controlled use of new fixed anchors at Mt. Charleston will not impair its natural character.

The Wilderness Act also requires that wilderness remain “*undeveloped*” and that it preserves “its *primeval character* and influence” and “with the imprint of man’s work substantially unnoticeable.” Used appropriately, wilderness climbing fixed anchors are unnoticeable except to those wilderness climbers that are seeking them out. Therefore, fixed anchors are a substantially unnoticeable imprint caused by this fundamental wilderness recreation use.

The Wilderness Act states that wilderness has “*outstanding opportunities for solitude or a primitive and unconfined type of recreation.*” Solitude is the sense of being alone or remote from the sights and sounds of other people; it is the experience of a lonely, unfrequented, or secluded place. Primitive recreation encompasses dispersed and undeveloped recreational opportunities that are appropriate in wilderness and require neither facilities nor motorized equipment. This sense of solitude has long been acknowledged as an important component of the wilderness experience. A new route permit process will help mitigate impacts and increase the opportunity for solitude by increase the number of routes accessible to climbers.

Wilderness climbing and the controlled use of new fixed anchors has no effect on ecological systems, other than to prevent potential impacts, thus ecological processes continue to function naturally regardless of fixed anchor use. Therefore, not only will a new route permit process at Mt. Charleston have no negative impacts on the Forest Service’s ability to preserve the area’s wilderness character, but allowing the use of new fixed anchors will facilitate the Forest Service’s ability to provide for an “intrinsic part of wilderness character”—opportunities for solitude through a longstanding type of primitive and unconfined recreation.

### **Minimum Tool**

We believe that when placed by hand after approval, new 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 Mt. Charleston Wilderness. The minimum tool required to safely and successfully place new and replace existing fixed anchors in Mt. Charleston is a hand drill, which necessitates a higher

degree of both skill and difficulty. Thus, requiring this arduous hand-drilling method coupled with a new route permit process will limit the proliferation of new bolts yet still allow a minimum number for the administration of unrestrained backcountry climbing at Mt. Charleston.

### **Access Fund and Las Vegas Climbers Liaison Council Assistance**

Please contact us for assistance with developing and implementing a new route permit process for Mt. Charleston 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>14</sup> as well as our website [www.climbingmanagement.org](http://www.climbingmanagement.org). In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>15</sup> or assistance from our Conservation Team,<sup>16</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. The climbing community and the Access Fund are ready, willing, and able to help planners develop and implement an effective new route permit process for Mt. Charleston Wilderness.

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Overall, the Plan's climbing management policies are reasonable, and subject to the addition of a new route permit process, we fully support the Plan's well-balanced approach. Mt. Charleston has vast amounts of undeveloped rock that, once developed, would help maintain the wilderness character and provide primitive, unconfined recreation. Thank you for considering a new route permit process for Mt. Charleston Wilderness. The Access Fund and Las Vegas Climbers Liaison Council have the experience, local contacts, and resources to help planners craft and implement a new route permit process that encourages climbing while preserving Mt. Charleston Wilderness characteristics. 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,



R.D. Pascoe  
Policy Director  
Access Fund

/s Javier Wasiak

Javier Wasiak  
President  
Las Vegas Climbers Liaison Council

Cc: Brady Robinson, Access Fund, Executive Director  
Scott Massey, American Mountain Guides Association  
Carol Hotchkiss, Recreation Planner, Humboldt-Toiyabe National Forest  
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<sup>1</sup> The Las Vegas Climbers' Liaison Council (LVCLC) is dedicated to ensuring climbing access, encouraging stewardship of the environment, and cultivating a sense of community in a world-class climbing destination. The LVCLC is supported and recognized by the Access Fund, the American Safe Climbing Association, the American Mountain Guides Association, and many other climbing organizations that give back to the climbing community through numerous efforts. The LVCLC is a non-profit organization (501(c)(3)), and we operate completely through the efforts and financial support of the climbing community and businesses who recognize the importance of environmental stewardship and climbing access. Funds raised go directly to supporting our mission. In an effort to maintain our operational budget, the LVCLC is operated by a completely volunteer board. See <http://www.facebook.com/pages/Las-Vegas-Climbers-Liaison-Council/106333446111670#!/pages/Las-Vegas-Climbers-Liaison-Council/106333446111670>

<sup>2</sup> BLM is currently working on a Draft Wilderness Management Plan for Arrow Canyon.

<sup>3</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>4</sup> For our specific comments on these various Nevada management plans, see [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5050525/k.11DB/Position\\_statements.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5050525/k.11DB/Position_statements.htm).

<sup>5</sup> *Preliminary Mt. Charleston Wilderness Management Plan* at p. 27.

<sup>6</sup> See [http://home.nps.gov/jotr/planyourvisit/fixed\\_anchors.htm](http://home.nps.gov/jotr/planyourvisit/fixed_anchors.htm)

<sup>7</sup> See <http://www.nps.gov/neri/planyourvisit/upload/9-New-or-Update-Climbing-Route-Permit-Application.pdf>

<sup>8</sup> See <http://www.parks.state.co.us/Parks/EldoradoCanyon/ParkActivities/RockClimbing/ActionCommitteeforEldorado/Pages/ActionCommitteeForEldorado.aspx>

<sup>9</sup> See <http://www.rifleclimbers.org/BoltingPermits.aspx>

<sup>10</sup> [http://www.nps.gov/policy/DOrders/DO-41\(Corr\).pdf](http://www.nps.gov/policy/DOrders/DO-41(Corr).pdf)

<sup>11</sup>

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

<sup>12</sup> FSM 2300-Recreation, Wilderness, and Related Resource Management at p. 6.

<sup>13</sup> FSM 2300-Recreation, Wilderness, and Related Resource Management.

<sup>14</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

<sup>15</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>16</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).