



Protect America's Climbing



NM CRAG
NEW MEXICO CLIMBERS' RESOURCE & ADVOCACY GROUP

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Submitted via:

<https://eplanning.blm.gov/eplanning-ui/project/92170/595/8003782/comment>

**RE: Organ Mountains-Desert Peaks National Monument RMP/EIS Scoping-
DOI-BLM-NM-L000-2018-0086-RMP-EIS**

The Access Fund and New Mexico Climbers Resource Advocacy Group (NM CRAG) welcome this opportunity to provide input in the planning process for Organ Mountains-Desert Peaks National Monument RMP/EIS Scoping. This planning area contains some of the most scenic, wild and adventurous rock climbing in the desert southwest. The Organ Mountains, Desert Peaks, Potrillo Mountains, and Doña Ana Mountains all contain unique and treasured rock climbing resources that have been enjoyed by climbers for more than 70 years. Our members regularly climb at these locations, 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 national 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 a memorandum of understanding with the Bureau of Land Management.¹

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 Organ Mountains-Desert Peaks National Monument (the monument) was established to protect significant prehistoric, historic, geologic, and biologic resources of scientific interest, and includes four areas: the Organ Mountains, Desert Peaks, Potrillo Mountains, and Doña Ana Mountains. Our organizations have been supportive of this monument designation as well as new wilderness designations since 2014. In addition to protecting the cultural, historical, and ecological legacy of the monument, the BLM stated they will also provide opportunities for recreation, scientific research, and public education.² The monument also offers a diverse range of recreational opportunities including rock climbing. Rock climbing occurs in the Organ Mountains, Desert Peaks, Potrillo Mountains, and Doña Ana Mountains. Rock climbing is currently recognized on the monument website³ and has been taking place for over 70 years. Previous management plans for the areas also recognized climbing as an appropriate activity.⁴

Organ Mountains

The Organ Mountains are home to hundreds of traditional rock climbs. Climbing has occurred in this area for over 70 years. The Organ Mountains are known for long approaches, rugged environment and adventurous climbs. We request the new management plan recognize rock climbing and continue to allow for traditional (trad) rock climbing throughout the Organ Mountains. In addition the continued placement and replacement of fixed climbing anchors should be allowed in accordance with BLM

¹ See

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

² See

OMDPNM RMP/EIS Preparation Plan – April 2017

<http://npshistory.com/publications/blm/organ-mountains-desert-peaks/rmp-2017.pdf>

³ See

<https://www.blm.gov/programs/national-conservation-lands/new-mexico/organ-mountains-desert-peaks-national-monument>

⁴ See

https://eplanning.blm.gov/public_projects/lup/72801/97036/117193/LCDO_-_1993_-_Mimbres_Resource_Area_RMP.pdf

wilderness policy.⁵ Fixed anchors often provide the only source of protection to safely ascend and/or descend from technical vertical terrain.

La Cueva

Within the Organ Mountain unit we request continued access and use of the La Cueva area for rock climbing (except above the cave) and continue to allow the placement and replacement of fixed climbing anchors in consultation with the local rock climbing community and established climbing groups such as NM CRAG, Organ Mountain Technical Rescue Squad, or other such organization that are trained in fixed hardware installation and best practices.

Dripping Springs and Aguirre Springs Access

We recommend that the gate hours at Dripping Springs & Aguirre Springs to be extended (1 hour prior to sunrise, 1 hour after sunset) to allow for a wider window of access for climbers attempting longer climbs and or trying to avoid extreme heat during the warmer months, or attempting to climb remote routes during short winter days.

Doña Ana Mountains

The Doña Ana Mountains contain both traditional and sport climbing areas that have been used for over 50 years. We request traditional and sport rock climbing on rocks known as Checkerboard, and the surrounding Rocks in the Doña Ana Mountains Unit be recognized in the RMP and continued to be allowed. The placement or replacement of fixed climbing anchors should continue to be allowed in accordance with BLM guidance. The Access Fund, NM CRAG and the local climbing community are ready to assist BLM in developing language and addressing site specific management.

Desert Peaks

The Desert Peaks area contains many traditional and sport rock climbing areas on cliffs known as Rough & Ready, and the surrounding areas. Climbing has occurred in this area for over 25 years. The placement and replacement of fixed climbing anchors should continue to be allowed with BLM guidance. The Access Fund, NM CRAG and the local climbing community are ready to assist BLM in developing language and addressing site specific management.

Road Access

The road and parking area for the popular climbing spot called "Rough & Ready" needs improvement. In addition a portion of the road to access this popular area is on a

⁵ USE OF PERMANENT FIXED ANCHORS FOR CLIMBING IN DESIGNATED WILDERNESS AREAS MANAGED BY BLM

<https://www.blm.gov/policy/im-2007-084#:~:text=BLM%20regulations%20allow%20the%20placement,policy%20is%20effective%20upon%20issuance.>

section of State Land Trust land. We encourage the BLM to pursue and request a transfer to BLM of the section of State Land Trust land that includes the road to and the parking area of the climbing area called "Rough & Ready".

Potrillo Mountains Unit

There are numerous climbing areas in the Potrillo Mountains unit that are ideal for beginner climbers. We request these areas be recognized in the management plan and continue to allow for traditional or sport rock climbing in this area. The placement and replacement of permanent climbing anchors should continue to be allowed with BLM guidance. The Access Fund, NM CRAG and the local climbing community are ready to assist BLM in developing language and addressing site specific management.

Fixed Anchor Management

We recommend the 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 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 ample precedent set for the allowance⁶ of fixed anchors on BLM land. The BLM has a policy specifically allowing the use of fixed anchors in wilderness⁷ as long as climbing activities do not diminish natural or cultural resources.

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

⁶ Top BLM Recreational Climbing Opportunities

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

⁷ <https://www.blm.gov/policy/im-2007-084>

“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 Act⁸ 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

*(2) subject to any terms and conditions determined to be necessary by the Secretary.”*⁹

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 the majority of BLM visitors, 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:

⁸ <https://www.congress.gov/bill/116th-congress/senate-bill/47>

⁹ <https://www.congress.gov/bill/116th-congress/senate-bill/47>

- 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 motorized drills as an appropriate and practical tool for placing and maintaining fixed anchors in the front country (non-wilderness areas) and prohibit motorized drill in wilderness.
- 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.

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 and route climbers away from sensitive resources. Access Fund's Conservation Team and Stewardship Program¹⁰ 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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¹⁰ <https://www.accessfund.org/capabilities/stewardship-conservation>

Thank you for your consideration of these comments on the Organ Mountains-Desert Peaks National Monument RMP/EIS 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 style with a large, stylized "K" and "G".

Katie Goodwin
Policy Analyst
The Access Fund