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Comments: March 19, 2014

Coconino National Forest

Attention: Yewah Lau, Forest Planner

1824 S. Thompson Street

Flagstaff, AZ 86001

Sent to: coconino\_national\_forest\_plan\_revision\_team@fs.fed.us

RE:Access Fund Comments on the Draft Land and Resource Management Plan for  
Coconino National Forest

Dear Forest Planning Team,

The Access Fund appreciates this opportunity to comment on the Draft Land and Resource Management Plan for Coconino National Forest (the Plan). We are encouraged that rock climbing is recognized as one of the important dispersed recreational uses and opportunities provided by the Coconino National Forest (NF) and are committed to assisting planners by providing climbing management expertise, resources, and community outreach.

Access Fund

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and conserve 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 advocacy organization with nearly 10,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service

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

## COMMENTS

The Access Fund appreciates that the Plan acknowledges that the rock climbing resources of Coconino NF are high-value and provide some of the best rock climbing and bouldering experiences in the country by stating that "[s]everal rock climbing areas on the forest are nationally and internationally known."<sup>2</sup> Climbers deeply appreciate the recreation opportunities on Coconino NF and are committed to protecting the environment and supporting the local economy.

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## Biophysical Resources

Historically, climbers have been responsible land stewards and comply with land-use regulations, and the northern Arizona climbing community is dedicated to collaborating with the Forest Service to protect natural and cultural resources that overlap with the world-class climbing areas on Coconino NF. The Access Fund and the local climbing community agree with the Plan's goal, regarding the desired condition for dispersed recreation sites, that "[c]aves, cliffs, and talus slopes have geological features that provide unique habitats for plants and wildlife, including some rare species, and are protected from damage or alteration that may result from recreational uses such as cave exploring and rock climbing."<sup>3</sup> The Access Fund is also committed to supporting the stated 'desired conditions' for rock climbing activities to "not diminish the quantity or quality of specialized vegetation, such as lichens, and wildlife communities nor do these activities disrupt life processes of rare or threatened species."<sup>4</sup>

In order to maintain the integrity of the climbing environment and support resilient climbing resources, the Access Fund and local climbers need to be intimately involved in the research and management of climbing sites in order to foster balance between recreation demands and sensitive resources. Therefore, the Access Fund would like to be involved in the ongoing Lake Mary Ecosystem Analysis in relation to the high-quality bouldering and climbing resources within that management area. Climbers also need to be involved in the ongoing Mt. Elden recreation resources planning process.

## Raptors

The Plan states that "[a]ir tour companies and rock climbing activities should not disturb occupied eyries between March 1 and August 31, to protect the area during the peregrine falcon breeding season and to protect other raptor species sensitive to noise disturbance."<sup>5</sup> Nationwide, many successful raptor regulations are based on site monitoring and cliff characteristics, and are therefore flexible in terms of both temporal and spatial extent. The Access Fund recommends that a monitoring system should be used to properly inform a flexible regulatory tool instead of relying on a fixed closure that will result in unnecessary collateral impacts to recreational and commercial climbing opportunities. The Access Fund has compiled many scientific raptor studies, examples of successful and flexible restriction systems, as well as produced the handbook, *Raptor and Climbers*, in consultation with biologists and land managers.<sup>6</sup>

## Climbing Management

The Access Fund endorses the development of "a rock climbing management strategy for the Oak Creek Vista area that addresses climbing needs, visitor safety and resource protection."<sup>7</sup> However, the Access Fund and local climbers should assist with this 'management approach' for the Oak Creek Canyon Management Area in order to ensure that the strategy addresses the site

specific needs of the climbing community. The Access Fund publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*<sup>8</sup> is a valuable resource to help direct successful climbing management strategies.

## Travel Management

Many roads on the Coconino NF are critical for accessing climbing resources. The Access Fund and the local climbing community want to be involved in the travel planning process to protect access to important climbing

resources and help the Forest Service identify critical, as well as redundant, roads and trails. Climbers can play a key role in identifying currently unmanaged roads that are necessary for accessing well-used climbing resources. For example, the Kelly Canyon and Woody Mountain roads need to be maintained to facilitate access to high-quality bouldering sites.

#### Access Fund Assistance

Access Fund actively collaborates with local climbing organizations, climbing gyms (Flagstaff Climbing Center and Beta Bouldering Gym) and the northern AZ American Alpine Club representative. We have a regional coordinator located in Flagstaff in order to assist the Access Fund's understanding of climbing-related issues on the Coconino National Forest.

Please contact us for assistance when developing climbing management strategies for 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>9</sup> has proven to be a useful tool for land managers across the country.<sup>10</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 process may qualify for Access Fund Climbing Preservation Grant Program<sup>11</sup> or assistance from our Conservation Team<sup>12</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 Coconino National Forest. Overall, the Plan concepts related to rock climbing are reasonable and the Access Fund supports Coconino National Forest's approach. The Access Fund looks forward to 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 (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Best Regards,

Erik Murdock Policy Director Access Fund

Cc:Brady Robinson, Access Fund, Executive Director Jacob Delonce, Access Fund, Regional Coordinator Jeff Snyder, American Alpine Club, Arizona Co-Chair John Doskicz, Flagstaff Climbing Center

<sup>1</sup> See

[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>2</sup> Draft Land and Resource Management Plan for Coconino National Forest, page 28

3 Id.

4 Id. page 29

5 Id. page 101

6 See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5014009/k.6AFE/Climbing\\_and\\_Raptors.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5014009/k.6AFE/Climbing_and_Raptors.htm)

7 Draft Land and Resource Management Plan for Coconino National Forest, page 144

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

9 Id.

10 See also [www.climbingmanagement.org](http://www.climbingmanagement.org).

11 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).

12 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).