

REC'D USDA

SEP 05 2017

August 29, 2017

Cal Joyner
Regional Forester
Southwestern Region
333 Broadway SE
Albuquerque, New Mexico 87102

REGIONAL FORESTER'S OFFICE
SOUTHWESTERN REGION.

Regional Forester: _____
Deputy Regional Forester: _____
Deputy Regional Forester: _____
CC Staff: _____
Return to: _____

Re: Apache Leap Special Management Area

Dear Mr. Joyner:

I have provided comments before regarding a proposed ban on climbing bolts on Apache Leap. Let me be clear: I am unequivocally opposed to a ban on bolts at Apache Leap, in any form.

Since submitting my last comment opposing a ban on bolts, the verbiage in the proposed document (Apache Leap Special Management Area Management Plan) has changed. I provide the latest text here, found on page 26 (dated August 2017), so there will be no confusion.

3.5.4 MANAGEMENT APPROACHES

Work with local non-governmental organizations, local governments, tribes, and recreation groups to establish sustainable rock climbing and bouldering expectations in the Apache Leap SMA. Develop an Apache Leap Special Management Area Climbing Management Plan in a manner consistent with the stated purposes of the Apache Leap SMA, as identified in the NDAA. Within the Climbing Management Plan, consider designating approaches to the escarpment from the west side, designating climbing routes, and prohibiting new bolting on select climbing routes to minimize environmental impacts.

- I support the designation of approaches from the West side. Since access will eventually be lost from the East, due to proposed mining activity, access from the East is essential if the area is to be enjoyed at all.
- What is meant by "designating climbing routes"? Does this mean that a certain subset of existing climbing routes will be designated "allowed to climb"? That is unacceptable. All existing routes and ones that are developed in the future should be allowed to climb, under a climbing management plan, which should be developed with the input of many climbers, not just a few. I object to this text simply because it is not clear what is meant.
- Likewise, "prohibiting new bolting on select climbing routes" makes no sense. Virtually all existing climbing routes on Apache Leap have bolts. Is the intent here to not allow replacing bolts that are worn or damaged on existing routes that are "designated"? Or is this a complete ban on bolts? Either way, I object to this new verbiage, as it is confusing. If it is confusing to me (I'm a climber), how will it be interpreted by Forest Service personnel, tasked with the enforcement element to this proposed management plan, who may or may not be climbers? I object to any ban on bolting on any basis. As stated in the management plan, the bolting ban is to minimize environmental impacts. If that is truly the concern, then please ban all human activity in the area. Other activities will have a much larger impact than that of a few climbers placing bolts. If it is the hole that is drilled into the rock that is the issue, banning bolts won't solve that. There is a type of gear on the market today that only requires a hole. No bolt, no hanger. The problem with that is that the hole is open to the elements and will degrade and become visible faster than if a bolt were to be placed into it. No, you're better off allowing bolts OR banning all human activity from the area.

Apache Leap SMA is not designated wilderness. If it were, then the bolting ban is consistent with how, for example, the Superstition Wilderness is managed. However, it appears that Apache Leap will be managed more like a primitive park, like Yosemite NP or Joshua Tree NP or even Grand Canyon NP. Bolts are used in all these locations, presumably within the constraints of a climbing management plan. One could argue that climbing is a historical use at those places. It is at Apache Leap as well. Maybe the native sacred lands issue is at play here at Apache Leap. All of the three locations I use as an example have, or had, those same issues.

Climbers are a loose collection of people seeking freedom to participate in an activity that requires rock. By banning bolts outright, you take away that freedom. In the past, climbers have not been sensitive to other users around them, and this has hurt their plea for an allowance of bolts. However, the bolts of today are very different from the ones used in the past. They used to be shiny, and if the sun hit them just right, you could see them from far away. While these kinds of bolts are still available, their usage is on the decline. Today, most climbers install bolts, and the associated hangers, that can blend into any rock color so that they cannot be seen from even 20 feet away. You have to really know what you are looking for to see them. Who looks that hard to find them, other than climbers? Admittedly, I may not be aware of the latest advances in bolting technology, but a climbing management plan, with lots of climber input, can address this issue as well.

With a proper climbing management plan in place, usage of the appropriate bolts and even their location can be explicitly directed. I object to a bolting ban of any kind at Apache Leap. If a bolting ban remains within the plan, I doubt the Forest Service can adequately enforce it. Climbers will find a way to place bolts, and that activity will be with no oversight in place whatsoever. A far better plan is to allow bolts, but under a climbing management plan where proposed routes are submitted for approval, including the type, frequency, and color of the bolts used. There will be bolts placed at Apache Leap anyway, so you might as well have at least some control over the process. In my experience, most climbers will comply with a climbing management plan, as long as it does not ban bolts. This will be a more acceptable situation, for all concerned, than having first ascent parties (they place the bolts to begin with) place any kind of bolt they want wherever they want. The Forest Service will need a continuous presence at Apache Leap, with the ability to catch climbers in the act of placing a bolt, and this places additional strain on existing resources. The Forest Service has more important matters to address than policing climbers at Apache Leap, especially when a climbing management plan can address all, or nearly all, issues regarding the placement of bolts.

Respectfully, I submit my comments and objections. Please give them all due consideration. I appreciate the Forest Service for carrying out the task to which it was assigned. Keep up the good work!

Sincerely,

A handwritten signature in cursive script, appearing to read "David Gunn", written in dark ink. The signature is fluid and extends across the width of the text area.

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