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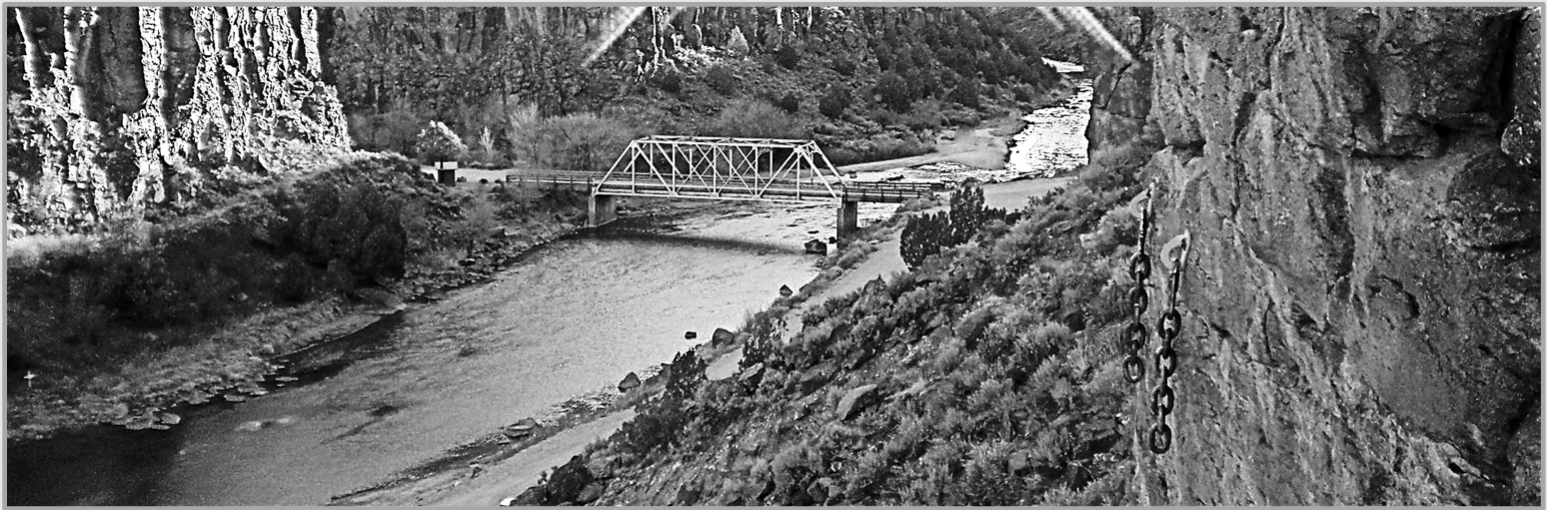
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Climbing Fixed Hardware Authorization

Programmatic Environmental Assessment

DOI-BLM-NM-F020-2022-0001-EA

Taos and Santa Fe Counties, New Mexico



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CHAPTER 1. INTRODUCTION

1.1 Background

In the 1970's climbing, as a modern recreational pursuit, became well established in Taos and surrounding public lands administered by the Bureau of Land Management (BLM). At that time, most route development focused on natural crack systems with climbers utilizing "traditional climbing" techniques using fall protection with the placement of pitons or using removable protection such as hexes, nuts and early camming devices as the climber ascended. In the 1980's a shift in interest toward harder face climbing occurred. Climbers began to widely utilize permanently installed bolts and hangers (fixed hardware) to protect routes. Advancement in climbing shoes, in power drills, and associated hardware allowed for climbers to develop new areas devoid of cracks. The 1990's and early 2000's saw continued route development with a handful of dedicated climbers seeking out new areas to be developed. From the early 2000's until the present, sport climbing (climbing only using fixed anchors or hardware) has become the primary method of new site (crag) and route development worldwide. This increase has led to exponential growth of additional developed climbing crags, across many BLM managed lands, and an increase in cultural and natural resource impacts such as petroglyph degradation, damage to migratory bird species nesting sites and recruitment failure, trampling of endemic plant species and creation of social trails leading to additional erosion.

The Taos Field Office has completed this programmatic Environmental Assessment (EA) to evaluate impacts for development of a climbing fixed hardware authorization process. This EA analyzes the installation and replacement of fixed hardware on all public lands managed by the Taos Field Office. More specifically, this EA analyzes the installation of fixed hardware on vertical terrain predominantly found within the Rio Grande Gorge in Taos County and Diablo Canyon in Santa Fe County.

1.2 Purpose and Need

The purpose of the climbing fixed hardware authorization process is to better manage climbing route development, regulate the installation and maintenance of fixed hardware, to proactively and adaptively manage potential and associated impacts to cultural and natural resources. An authorization process is needed to fulfil the requirements set forth in the 2001 Rio Grande Corridor Final Plan, the 2012 Taos Resource Management Plan, and 2024 Rio Grande del Norte National Monument Plan Amendment for regulating and approving installation of new climbing hardware. Development of an authorization process for new climbing fixed hardware would better manage climbing route development while avoiding, minimizing, and mitigating any potential future associated impacts to cultural and natural resources.

1.3 Decision to be Made

The BLM will decide on the adoption of a site evaluation process for authorizing fixed rock-climbing hardware on public lands administered by the Taos Field Office.

1.4 Plan Conformance

The proposed permit process is in conformance with the Rio Grande Corridor Final Plan and the Taos Resource Management Plan.

The 2001 Rio Grande Corridor Final Plan states, “Individuals would be required to have a permit only if they intended to permanently install hardware.”

The 2012 Taos Resource Management Plan (RMP) states, “Installation of new rock-climbing routes or hardware will require pre-approval by the BLM.”

The 2024 Rio Grande del Norte National Monument Management Plan- REC Management Action 5. New rock-climbing routes that use fixed hardware will require preapproval by the BLM through site-specific NEPA analysis and be subject to NHPA Section 106. Replacement of existing fixed hardware on existing rock-climbing routes will be subject to NHPA Section 106. No rock-climbing will be permitted within raptor-nesting areas during seasonal restrictions. Consistent with Wildlife Management Action 13, rock-climbing may be restricted in priority migratory bird habitat during the nesting season, as determined on a case-by-case basis. Rock-climbing will not be allowed within 50 feet of cultural resources, as determined on a case-by-case basis. Existing routes determined to be in conflict with Monument objects and values will be subject to removal.

1.5 Identification of Issues

The BLM consulted with the Access Fund, Taos Climbing Coalition, and New Mexico Climbers Resource and Advocacy Group (NM CRAG) starting in the fall of 2020. Meetings, both in person and virtually, continued through the summer of 2024. NM CRAG and the Taos Climbing Coalition with the input of the Access Fund, submitted a formal proposal for a fixed hardware authorization process in May of 2021. Additionally, NM CRAG in collaboration with Access Fund submitted formal comments in February 2023 to the Taos Field Office Fixed Hardware Authorization that were addressed, and some suggestions were integrated into the 2024 Rio Grande del Norte National Monument Plan.

An interdisciplinary (ID) team of Taos Field Office resource specialist conducted internal project development and scoping meetings beginning in May 2021. During the spring and early summer of 2021, several site visits to areas impacted by climbing hardware and route development occurred to assess potential impacts and concerns.

1.5.1 Relevant Issues

Based on the scoping efforts described above, the issues presented in Table 1.1 have been determined relevant to the analysis of this action:

Table 1-1. Issues Identified for Detailed Analysis

RESOURCE	ISSUE STATEMENT
Recreation	Issue 1: How would recreational opportunities be impacted by the development of an authorization process for the installation of fixed anchors on lands managed by the Taos Field Office?

Cultural Resources	Issue 2: How would the installation of new fixed hardware or replacement of existing fixed hardware impact cultural resources?
Wildlife	Issue 3: How would the installation of new fixed hardware or replacement of existing fixed hardware impact nesting raptors?
Wildlife	Issue 3A: How would the installation or replacement of fixed hardware in conjunction with rock route development impact migratory and resident bat populations?
Vegetation	Issue 4: How would the continued development of climbing routes at existing sites and potential expansion to new sites impact vegetation at these locations.

1.5.2 Issues Dismissed from Detailed Analysis

Table 1-2. Issues not Analyzed in Detail

ISSUE STATEMENT	RATIONALE FOR DISMISSING
Visual Resources	Impacts to visual resources are anticipated to be minimal. All climbing hardware would be painted to match surrounding rock. Evidence of route development such as tick marks would be removed after route development is complete. These are current ethics and common practice embraced by the climbing community. The authorization process would further ensure that these standards are followed.
Soils	The proposed action is not expected to have significant impacts to soil resources. In most cases, approach to climbing areas is over existing trails or exposed rock. Installation of climbing hardware occurs on vertical or near vertical rock faces.
Invasive Plants/Noxious Weeds	The proposed action is not expected to have significant impacts resulting in the introduction of invasive plants or noxious weeds. Formalizing the authorization process would be a benefit rather than an impact. The Taos Field Office has an active weeds program that monitors public lands for noxious weed infestations.
Air Resources	Air Quality is not expected to be impacted. Hardware installation typically utilizes battery powered hammer drills. There may be moments of rock dust lingering in the immediate vicinity during hardware installation, but this is not expected to have any sort of long term or cumulative affect on the air quality of the immediate area.
Water Resources	Water Resources are not expected to be impacted. Areas utilized for rock climbing are typically dry and devoid of moisture. If access to potential climbing areas or hardware installation were to affect water resources such as streams, seeps, or rivers, then site specific stipulations would be developed to mitigate impacts.
Wilderness	There are no Wilderness or Wilderness Study Areas within the proposed scope of the EA.

T&E and Special Status Species	If T&E species are identified in proposed route development areas, they would not be authorized unless stipulations, including buffers could be put in place to mitigate impacts. BLM reached out to USFWS on two occasions for informal consultation. Due to administrative nature of this project, BLM believes it has done due diligence in considering actions on wildlife.
Dark Skies	Rock climbing activities takes place primarily during daylight hours. Impacts to Dark Skies environment are not anticipated.

1.6. Relationship to Statutes and Regulations

Proclamation 8946 of March 25, 2013, Establishment of the Rio Grande del Norte National Monument The Secretary of the Interior (Secretary) shall manage the monument through the Bureau of Land Management (BLM) as a unit of the National Landscape Conservation System, pursuant to applicable legal authorities, including the Wild and Scenic Rivers Act (82 Stat. 906, 16 U.S.C. 1271 et seq.), to implement the purposes of this proclamation. The Secretary shall, in consultation with Indian tribes, ensure the protection of religious and cultural sites in the monument and provide access to the sites by members of Indian tribes for traditional cultural and customary uses, consistent with the American Indian Religious Freedom Act (92 Stat. 469, 42 U.S.C. 1996) and Executive Order 13007 of May 24, 1996 (Indian Sacred Sites).

Federal Land Policy and Management Act of 1976, Section 102 {43 U.S.C. 1701} (a) (2) the national interest will be best realized if the public lands and their resources are periodically, and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other Federal and State planning efforts. (5) in administering public land statutes and exercising discretionary authority granted by them; the Secretary be required to establish comprehensive rules and regulations after considering the views of the general public; and to structure adjudication procedures to assure adequate third-party participation, objective administrative review of initial decisions, and expeditious decision-making; (8) the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values: that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use.

The Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712) and The Bald and Golden Eagle Protection Act of 1940 (16 U.S.C. 668-668d) prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service.

The Antiquities Act of 1906 (16 USC §§ 431–433); National Historic Preservation Act (NHPA), as amended (54 U.S.C. §§ 300101-307108); Archaeological Resources Protection Act of 1979 (16 USC §§ 470aa–470mm); and the Native American Graves Protection and Repatriation Act of 1990 (25 USC §§ 3001–3013). Relevant direction for considering the impacts of the proposed alternatives on cultural resources is provided by Sections 106 and 110 of NHPA, Executive Order 13287, and the Protocol Agreement between BLM New Mexico and the New Mexico State Historic Preservation Officer. BLM Manuals 8100–8170 and the Taos Resource

Management Plan (BLM 2012) provide guidance and policy direction on the identification, evaluation, management, and protection of cultural resources, as well as tribal consultation. The 2014 State Protocol Agreement between the BLM and the New Mexico State Historic Preservation Officer guides the manner in which the BLM will meet its responsibilities under the NHPA in New Mexico.

The 2024 Expanding Public Lands Outdoor Recreation Experiences Act (EXPLORE Act) (e) EXISTING ROUTES.—The guidance issued under subsection (a) shall include direction providing for the continued use and maintenance of recreational climbing routes (including fixed anchors along the routes) in existence as of the date of the enactment of this title, in accordance with the Act.

Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and a Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The [bureau] verifies that it has complied with the requirements of NEPA, including the Department’s regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President’s January 2025 Order and Memorandum.

CHAPTER 2. ALTERNATIVES

2.1 Alternative A – Proposed Action

The Taos Field Office is proposing to adopt a process for authorizing climbing route development and installation of fixed hardware to conform with general requirements in the Rio Grande Corridor Final Plan, Taos RMP, and Rio Grande del Norte National Monument Management Plan and to avoid, minimize, or otherwise mitigate any potential resource impacts. The proposed permitting process includes the following general steps:

1. A BLM interdisciplinary team would work with stakeholders to inventory and evaluate climbing areas on an annual basis—until all climbing areas or proposed climbing areas have been evaluated—to identify any potential conflicts with the protection and management of cultural and biological resources. The BLM would seek input annually from stakeholders to determine priority areas for field reviews and evaluation.
2. Climbing routes with conflicts to cultural, biological, and geologic resources would be closed to climbing and any associated hardware would be removed. Potential impacts would be avoided by the following parameters:
 - a. No climbing would be permitted within 50 feet of cultural resources, as determined on a case-by-case basis.
 - b. No climbing would be permitted within raptor-nesting areas during periods of seasonal restrictions, per the applicable BLM land use plan (i.e., Monument Management Plan for Rio Grande del Norte National Monument or Taos RMP).

- c. The development of new climbing areas would also be subject to protection measures for migratory bird nesting. The removal or disturbance of nests is in violation of the Migratory Bird Treaty Act (16 U.S.C. 703-712).
3. Remaining portions of the climbing area not closed for resource protection and management would be available for new climbing hardware or the replacement of existing hardware without further authorization from the BLM, unless new information or a change in circumstances warrants additional reviews.

The BLM may rely on partnerships, including those formalized through cooperative agreements, to assist in the evaluations of climbing areas for potential conflicts and impacts to cultural and biological resources.

2.1.1 Design Features

The BLM would apply stipulations and best management practices for rock climbing and access to climbing areas. These include, but are not limited to, the following:

- Whenever possible, replace unsafe or antiquated fixed anchors in close proximity to the current locations unless there is a legitimate concern for safety to relocate them elsewhere.
- To minimize visual contrast, the follow measures would be applied:
 - Camouflaged fixed anchors must be used for new routes and the replacement of old anchors to match natural rock color before installation in the rock—see **Figure 1**.
 - If manufactured camouflaged fixed anchors are not available, bolt heads and washers **must be painted, before being placed on the rock** to match surrounding rock color as best as possible.
 - All top anchor components must be painted to best match the surrounding rock.
 - Chalk associated with route development must be removed (i.e., tick marks).
- Only remove loose rock from its natural position when it poses a significant risk to the climbing party or a future climbing party.
- Modifying the rock surface (e.g., chipping or gluing) or attaching artificial holds is prohibited in accordance with 43 CFR 8365.1-5 (2).
- Fixed anchors can only be placed in open areas. The BLM will provide a map, and detailed descriptions of areas closed to route establishments due to resource conflicts.
- The removal/disturbance of migratory bird species nests and dwellings will not be allowed. Any proposed site with existing nesting sites (migratory or raptor) will not be authorized.

- The removal of vegetation must be avoided. This includes on climbing routes, at the base of cliffs and on approach trails. If a tree or other vegetation needs to be removed, this will be considered on a case-by-case basis by the BLM. Any locations of special status plants species will be avoided. Proposed routes close to special status plants would likely not be authorized.
- Upon the completion of and fixed anchor placements, the route developer(s) shall notify the BLM and provide digital photos of the route(s) which show the location of installed bolts/hangers, number of routes developed, route names and rating.
- Route developers should follow the latest industry standards for selection of fixed anchor hardware and may include, but may not be limited to, the following current recommendations:
 - Stainless steel hardware (hangers and bolts)
 - Minimum of 3/8-inch bolt diameter
 - Minimum of 2¼-inch bolt length (3½-inch is preferred)
- Top anchors should consist of two separate hangers bolted to the rock with a minimum of 3/8-inch x 3½-inch stainless steel bolts.
- Bolting is prohibited where removable protection (cams, nuts, etc.) is adequate and available.
- Chipping, gluing, or excessive cleaning (i.e., gardening, contriving/manufacturing a route that the natural rock does not provide) is not permitted.
- Route developers must notify the BLM within 48 hours of any observed resource concerns. The placement or replacement of fixed anchors must not occur until clearance is granted by the BLM. This notification can take place by phone, email, or in person. If possible, a photo and GPS coordinate of the issue(s) shall be submitted.



Figure 1. Example of camouflaged bolt and hanger.
P.C. mountainproject.com



Figure 2. The John Wall near John Dunn Bridge. Hangers have been camouflaged to blend in with surrounding rock.

2.2 Alternative B – No Action Alternative

Under the no action alternative, the BLM would not have an authorization process for new route development or the placement of fixed hardware. Under the no action alternative, the BLM anticipates that route development will continue to occur without their knowledge or authorization. Impacts to natural and cultural resources from route development will not be evaluated, monitored, or mitigated, and areas of critical environmental concern could be developed. Recent un-authorized route proliferation that has occurred at the Bend Wall and Vista Verde Wall climbing areas is an example of what is likely to continue occurring if the no action alternative is selected. Conflicts between user groups could also develop due to unregulated development.

2.3 Alternatives Considered but Dismissed from Detailed Analysis

The BLM initially proposed a process by which the BLM would train and authorize individuals that apply for a permit to hang and/or replace fixed climbing hardware. The BLM released a draft EA in January 2023 that analyzed such a proposed authorization process. After substantial input received on the draft EA and in consideration of public input received on a Management Plan for Rio Grande del Norte National Monument (DOI-BLM-NM-F0200-2023-0014-RMP-EA)—where climbing is prevalent within the Taos Field Office—the BLM adjusted its proposed action to better align with stakeholder’s recommendations and conventional BLM authorization practices involving interdisciplinary team reviews. The original proposal by the BLM lacked a practical application with fewer safeguards to ensure the protection of resources. The original process also involved the development of a training curriculum that was undefined and relied too

heavily on the good intentions of individuals that lack the special expertise necessary for evaluating potential climbing routes. For these reasons, this authorization process was abandoned by the BLM as a reasonable option.

CHAPTER 3. Affected Environment and Environmental Impacts

3.1 Issue 1: How would recreational opportunities and experience be impacted by an authorization process for the installation of fixed anchors on lands managed by the Taos Field Office?

3.1.1 Affected Environment

Climbing predominately takes place along basalt outcrops along the rim of the Rio Grande Gorge (see **Appendix A**) within Rio Grande del Norte National Monument in Taos County, with another concentration of climbing opportunities in the Diablo Canyon area in Santa Fe County (**Image 3**). The predominant style of climbing in these areas is *sport* climbing, generally characterized by a reliance on the use of fixed climbing hardware such as a series of bolts with metal hangers into which climbers can clip ropes to prevent lengthy falls.

According to Mountain Project (mountainproject.com), a popular online resource for rock climbing, opportunities within the Rio Grande Gorge consist of 8-10 areas where at least 186 individual sport climbing routes are developed with fixed hardware. Taos BLM recreation staff think this number is significantly lower than what is actually in the planning area. Rangers stationed at Rio Grande Gorge Visitor Center in Pilar recently (February 2025) found 13 additional routes on the Vista Verde Wall that had not been previously cataloged. At the Diablo Canyon area, approximately 137 sport climbing routes are developed on BLM managed lands, USFS lands in the Diablo Canyon area contain numerous additional developed routes.

For the most part, these climbing areas are seldom used for other recreation opportunities due to the vertical nature of the cliffs and access difficulties faced by the public. The John Dunn Bridge, Vista Verde areas within the Rio Grande Gorge and Diablo Canyon are anomalies with developed climbing occurring where other recreational use occurs, such as whitewater/river activities, hiking, mountain biking and motocross by multiple user groups. Vista Verde Wall is within the Orilla Verde Recreation Area and there are campgrounds within two miles of the site. Diablo Canyon has four developed campsites located at the trailhead which is approximately ¼ mile from one of the main climbing walls. At these locations, high season for climbing occurs in the spring and fall and tapers in the heat of the summer months. However, with the trending weather patterns of warmer winters, climbing is more common on a year-round basis. Seasonality in use at these sites has somewhat mitigated conflicts and competition for parking and developed infrastructure between climbers and other recreational user groups.



Figure 3. Diablo Canyon, located off Old Buckman Rd., Santa Fe County.



Figures 4 & 5: Typical areas of basalt along the Rio Grande Gorge where route development likely to occur.
P.C.: mountainproject.com

3.1.2 Environmental Impacts

Climbing has seen an increase in popularity and participation within the boundaries of the Rio Grande del Norte National Monument and other Taos Field Office administered lands, over the past 20+ years. This is evident in the enhancement of social trails leading to climbing sites, unauthorized route development and hardware installation seen at all of the inventoried climbing locations in Taos and Santa Fe counties. Unauthorized route development has led to migratory bird nests (cliff swallows) nests being cleaned off of cliff faces, anchors placed in close proximity to cultural resources leading to rock art (petroglyphs) being climbed over in addition to the above mentioned unauthorized social trail proliferation and enhancement. Rock climbing activities takes place primarily during daylight hours therefore minimal impacts to the dark sky environment is expected.

3.1.2.1 Impacts of Alternative A – Proposed Action

The formal authorization process could impact the ability of climbers to recreate in a manner consistent with historic use. Routes currently available to rock climbing could be excluded by the authorization process due to their conflicts with natural or cultural resources. Overall timeframe for new route development could be lengthened due to the BLM's limited resources to evaluate area-by-area on an annual basis, and the complexity of issues to be analyzed as part of the authorization process.

Under the proposed action, impacts to other recreation user groups and recreation opportunities are anticipated to be minimal. Future development is anticipated to occur in areas that are not suitable for other recreational pursuits. This is due to the nature of the terrain and overall access difficulties. Minimal user conflicts may occur in places like the John Dunn Bridge and Diablo Canyon areas that have already been developed and are heavily used by multiple user groups (see discussion in 3.1.1). These conflicts are not anticipated to grow due to additional route development. Overall, climbers represent a small fraction of recreational users. On an average day, 2-4 climbers visit locations such as Dead Cholla or the Vista Verde Wall within the Rio Grande Gorge. At places like John Dunn Bridge, a maximum of 10-12 climbers may be present at a given moment during high season, which could on occasion result in competition for parking and consequently result in parking on vegetation or in unsafe locations. Increased visitation by climbers to areas already experiencing other types of recreational use may additionally create sanitation issues in primitive and undeveloped access points. New areas developed through the proposed permit process would most likely see similar numbers as recorded at the Vista Verde Wall. Due to these relatively small use numbers, it is anticipated that common infrastructure utilized by multiple recreational user groups would see increased impacts from development of new climbing areas or routes. The annual inventory and evaluation process will help determine if any user conflicts and subsequent resource impacts occur and the best management practices to mitigate or eliminate those impacts.

3.1.2.2 Impacts of Alternative B – No Action Alternative

Under the no action alternative, the BLM anticipates a slowdown in climbing route development, which could limit opportunities for recreational challenges and experiences or lead to the crowding at existing climbing areas. Furthermore, despite a moratorium, some route development would likely continue to occur without BLM input or authorization as required under the 2001 RGCFP, 2012 RMP and 2024 RGdNMP conditions for new fixed hardware. Impacts to natural and cultural resources from new route development, in such cases, would go unmitigated.

Under existing conditions, recreational opportunities to develop climbing routes and to place fixed anchors would not be excessively curtailed due to the need for BLM authorization. Although new route and fixed hardware placement without oversight has not been allowed within the Rio Grande Gorge since the implementation of the 2000 Rio Grande Corridor Plan, the BLM has not enforced the requirement until recent years when the BLM became aware of

certain impacts to cultural resources from unauthorized route development at the Bam Wall and Bend Wall within the Orilla Verde Recreation Area.

Future development of climbing routes is anticipated to occur predominately along the rim of the Rio Grande Gorge with development being restricted by quality of rock and ability to access from a nearby road and existing parking. Additional development is also anticipated within already established climbing areas, including Diablo Canyon.

3.2 Issue 2: How would the installation of fixed hardware impact cultural resources?

3.2.1 Affected Environment

Cultural resources are found in locations throughout the lands administered by the BLM Taos Field Office. Petroglyphs ranging in origin and age from the Archaic Period to the 20th century, including Ancestral Puebloan and 16th century European colonial period are found throughout the area often in areas that overlap with the type and nature of basalt column rock that climbers find particularly attractive. Multiple types of historic properties, including rock structures, shrines, lithic reduction sites, camp sites, resource procurement sites, and habitation sites (both historic and prehistoric) are also common throughout the Taos Field Office. Route development if not authorized may impact these various types of sites as some are very subtle to the untrained eye. Climbers would be moving over petroglyphs, trammeling structures, contact from shoes, oils from hands, and chalk can obscure and hasten the erosion of rock art. The land administered by the Taos Field Office is the ancestral lands of multiple indigenous groups. Many places within the Taos Field Office hold ethnographic significance and climbing on or near them can be disrespectful to Native American communities. Tribal consultation remains ongoing.

3.2.2 Environmental Impacts

The installation of fixed hardware, including the replacement of existing hardware, can adversely affect the integrity of historic properties in various ways, including the creation of belay platform areas that can displace or break artifacts and features. The development of social trails to access climbing sites that can more easily erode because of poor design and routing. Petroglyphs and pictographs can be adversely affected by the creation of new climbing routes which can destroy visual integrity, cause breakage, destroy petroglyphs and wear away pictograph images, as well as adverse effects to the aspects of integrity, including setting and feeling of historic properties, including traditional cultural properties.

3.2.2.1 Impacts of Alternative A – Proposed Action

Relevant laws, ordinances, policies, regulations, and agreements other than NEPA include, but are not limited to: the Antiquities Act of 1906 (16 USC §§ 431–433); National Historic Preservation Act (NHPA), as amended (54 U.S.C. §§ 300101-307108); Archaeological Resources Protection Act of 1979 (16 USC §§ 470aa–470mm); and the Native American Graves Protection and Repatriation Act of 1990 (25 USC §§ 3001–3013). Relevant direction for considering the impacts of the proposed alternatives on cultural resources is provided by Sections 106 and 110 of NHPA, Executive Order 13287, and the Protocol Agreement between

BLM New Mexico and the New Mexico State Historic Preservation Officer. BLM Manuals 8100–8170 and the Taos Resource Management Plan (BLM 2012) provide further guidance and policy direction on the identification, evaluation, management, and protection of cultural resources, as well as tribal consultation. The 2014 State Protocol Agreement between the BLM and the New Mexico State Historic Preservation Officer guides how the BLM will meet its responsibilities under the NHPA in New Mexico. Co-stewardship agreements signed with Tesuque and Ohkay Owingeh Pueblos regarding the protection of public lands and indigenous territories would be followed in regard to government-to-government relationships and the decision-making process surrounding fixed hardware placement.

Under the proposed action, the BLM would follow relevant laws, ordinances, policies, regulations, and agreements to review each permit request to avoid adverse effects to cultural resources. The installation of fixed hardware, to include the replacement of existing hardware, would not be authorized within historic properties, and this would be determined following Section 106 of the NHPA in consultation with the NM SHPO, Tribal governments, and other interested parties. A cultural resources inventory would be completed and mitigation strategies developed prior to the issuing an authorization in order to avoid adverse effects to historic properties. The proposed action would have a beneficial impact on preservation of cultural resources.

3.2.2.2 Impacts of Alternative B – No Action Alternative

Under the no action alternative, the BLM would not authorize new route development or the placement (and replacement) of fixed hardware using the proposed process. This will likely result in a continuation of route installation without any BLM review taking place, including a cultural resource inventory. Trails to rock formations and climbing routes are created by climbers, not the BLM; therefore, none of these trails and routes are evaluated for cultural or biological resource concerns when they are created. The no action alternative could result in an adverse effect to historic properties.

3.3 Issue 3: How would the installation of fixed hardware impact nesting raptors and other migratory birds?

3.3.1 Affected Environment

Climbing predominately takes place along basalt outcrops along the rim of the Rio Grande Gorge—see Appendix A). A few locations, such as Diablo Canyon, occur outside of the gorge. Cliffs targeted for the development of climbing routes also serve as suitable habitat for nesting raptors. BLM lands managed by the Taos Field Office provide a diverse habitat for numerous cliff-nesting raptors, including red-tailed hawks (*Buteo jamaicensis*), bald eagles (*H. leucocephalus*), and golden eagles (*Aquila chrysaetos*).

Migratory birds often use rivers as migration corridors. Rivers provide easy passage, abundant forage, and spaces to stop-over. Some birds even use the cliff bands as nesting sites. Nest sites, past and present, are to be avoided. Activity around nesting sites can cause birds to leave nests unprotected or they may abandon them all together resulting in death of the offspring. This is

considered incidental take. “Take” as defined in these laws include molesting or killing, whether accidental or deliberate and is in violation of the Bald and Golden Eagle Protection Act of 1940 (16 U.S.C 668-668d) and/or the Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712).

3.3.2 Environmental Impacts

Many scientific studies have documented the negative impacts of human disturbance of raptor nest and roost sites, and the resulting nest failures and territorial abandonment associated with these disturbances

(Fyfe et al. 1976; Ogden and Hornocker.1977). The main sources of human disturbance of nesting raptors and other migratory birds on BLM managed lands are visitors that are rock-climbing and hiking on- and off-trail. Scientific studies have consistently suggested that these recreation activities can be balanced against raptor nesting by establishing closure or advisory areas that act as buffers between human activity and birds during the breeding season (Fyfe et al. 1976; Olsen and Olsen.1978; Becker and Ball.1980; Suter and Jones 1981; Porter et al. 1987; Holthuijzen.1990; Cade et al. 1996; White. et al. 2002).

3.3.2.1 Impacts of Alternative A – Proposed Action

The impacts from the fixed anchor authorization process are anticipated to be minimal to non-existent. The process prohibits the development of climbing routes and the placement of fixed anchors close to an established raptor nest. The spatial and timing avoidance parameters would be based on those established in the Taos Field Office’s land use plans and applied on a case-by-case basis. If a route or area is proposed to be developed that would have the potential to disturb nesting raptors or known nesting sites, the climbing areas will be seasonally closed. Active monitoring would occur prior to approval along with a data-base check to determine the presence of historic nesting activity.

3.3.2.2 Impacts of Alternative B – No Action Alternative

Without action by the BLM to manage the placement of fixed anchors, there is a potential for continued unchecked development. This development could lead to routes being developed near established raptor nests resulting in nest failures and territorial abandonment.

3.3A Issue 3A: How would the installation or replacement of fixed hardware in conjunction with rock route development impact migratory and resident bat populations?

3A.3.1 Affected Environment

Climbing predominately takes place along basalt outcrops along the rim of the Rio Grande Gorge—see Appendix A). A few locations, such as Diablo Canyon, occur outside of the gorge. Cliffs targeted for the development of climbing routes also serve as suitable habitat for migratory and resident bats and birds.

Scientific studies have documented the use of cliffs by bats for foraging, roosting and hibernating. Bats navigate crevasses looking for forage and may use cave systems within the cliff bands as hibernacula. Their presence contributes to the overall biodiversity of the system

including enhancement of soils to the betterment of small invertebrates that live in and on the soil where they roost.

3A.3.2 Environmental Impacts

How climbing effects bat activity is not well understood. Bat species are under threat from disease, shrinking habitat, and other anthropogenic activities (Wilson. 2019, Loeb and Jodice, 2018). It is important, moving forward, to protect these resources by reducing stressors that have led to their decline. This would include avoiding hibernacula to reduce interference with torpor and possible contamination of the space with deadly microbes.

3A.3.2.1 Impacts of Alternative A – Proposed Action

The impacts from the fixed anchor authorization process are anticipated to be minimal to non-existent. The process prohibits the development of climbing routes and the placement of fixed anchors within 200 meters of features that are found to support significant bat populations (Taos RMP, 2012). The spatial and timing avoidance parameters would be based on those established in the Taos Field Office's land use plans and applied on a case-by-case basis. If a route or area is proposed to be developed that would have the potential to disturb bat roosts or known hibernacula, the climbing areas may be seasonally closed (November –April). Active monitoring would occur prior to approval along with a data-base check to determine the presence of historic bat roosts/activity.

3A.3.2.2 Impacts of Alternative B – No Action Alternative

Without action by the BLM to manage the placement of fixed anchors, there is a potential for continued unchecked development. This development could lead to routes being developed on or near established bat roost sites and hibernacula resulting in colony failure due to spread of *Pseudogymnoascus destructans*.

3.4 Issue 4: How would the continued development of climbing routes at existing sites and potential expansion to new sites impact vegetation at these locations?

3.4.1 Affected Environment

The cold desert environment of the Taos Plateau is characterized by a diverse array of vegetation communities that reflect its unique topography, climate, and geology. Major vegetative communities within the Taos Field Office consist of Pinon/Juniper woodlands, grasslands, shrublands, and wetland or riparian zones. While most of these communities provide habitat for a variety of species, contribute to soil stabilization, or play a vital role in the hydrology of the area, they are also home to numerous endemic and sensitive plant species, slow growing lichens, and cryptobiotic soils.

3.4.2 Environmental Impacts

Social trails and development of non-system unauthorized trails results in a long-term decrease of vegetative cover, species richness, soil stability, and abundance of biological soil crusts.

Numerous studies have revealed that rock climbing has led to a decrease in floral diversity at the bases of rock-climbing cliffs which has been attributed to the trammeling of vegetation by rock climbers (Wilson 2019).

3.4.2.1 Impacts of Alternative A – Proposed Action

The impacts from the fixed anchor authorization process are anticipated to be minimal to non-existent to already existing access points and trails. The process prohibits the development of climbing routes and the placement of fixed anchors within close proximity to Threatened, Endangered, or Sensitive Plant Species. Adopting Alternative A would also give the BLM the ability to control the development of social and access trails to areas that have already been previously disturbed or are not likely to negatively impact vegetation or sensitive areas - thereby diminishing the unchecked impacts to vegetation.

3.4.2.2 Impacts of Alternative B – No Action Alternative

Unauthorized social trail development through sensitive vegetation, wildlife habitat, highly erodible soils, and crypto soils will continue to contribute to the degradation of vegetative communities within highly utilized areas of the Taos Field Office. Additionally, continued disturbance on social and unauthorized trails leads to inundation of invasive/weedy species.

CHAPTER 4. CONSULTATION AND COORDINATION

4.1 Summary of Consultation and Coordination

An email containing the SHPO consultation letter and this proposed programmatic EA was sent for SHPO review on April 7, 2025. In a letter dated April 21, 2025, the New Mexico SHPO concurred with the BLM TFO that all installation or replacement of hardware and the creation of associated access trails be subject to Section 106 (HPD log 125134).

The BLM notifies and consults with Tribal governments concerning public land management projects. Several laws, regulations and BLM policy guide these efforts, including the NHPA and its implementing regulations (36 CFR 800), NEPA, the Native American Graves Protection and Repatriation Act and its implementing regulations (43 CFR 10), Executive Order 13175 and BLM Manual H-1780.

On November 15, 2021 and March 26, 2025, the Taos Field Office sent invitations to consult on this planning effort with the following Tribal governments:

Apache Tribe of Oklahoma	Pueblo of Ohkay Owingeh
Comanche Indian Nation	Pueblo of Picuris
Hopi Tribe	Pueblo of Pojoaque
Jicarilla Apache Nation	Pueblo of Sandia
Kewa Pueblo	Pueblo of San Felipe
Kiowa Tribe of Oklahoma	Pueblo of San Ildefonso
Mescalero Apache Nation	Pueblo of Santa Ana
Navajo Nation	Pueblo of Santa Clara
Pawnee Nation of Oklahoma	Pueblo of Taos
Pueblo of Acoma	Pueblo of Tesuque
Pueblo of Cochiti	Pueblo of Zia
Pueblo of Isleta	Pueblo of Zuni
Pueblo of Jemez	Southern Ute Tribe
Pueblo of Nambe	Wichita and Affiliated Tribes

Tribal consultation is ongoing.

4.2 Summary of Public Participation

Beginning in 2021, the BLM engaged with the local climbing community to address the long-outstanding need for a formal new climbing route and fixed hardware authorization system. The BLM conducted field visits with rock climbing stakeholders at The Bend, Dead Cholla climbing areas, and other areas to better understand opportunities and issues associated with fixed climbing hardware. This productive dialogue continued through development of the EA through phone calls, emails, and meetings and contributed to the development of the proposed authorization process.

New Mexico Climbers Resource and Advocacy Group (NMCRAAG), the Taos Climbing Coalition, and the Access Fund have particularly been involved in the development of the authorization process. These organizations submitted a draft authorization process for consideration by the BLM in May of 2021 and have remained engaged with the BLM through the development of the EA.

The EA was made available for public review and comment on the BLM's National NEPA Register between January 27, 2023, and February 15, 2023, during which the BLM received 19 individual comment letters. In addition, input was received from the public in 2024 during the preparation of a Monument Management Plan for Rio Grande del Norte National Monument (DOI-BLM-NM-F020-2023-0014-RMP-EA), including climbing stakeholders, which contributed to further modifications to the proposed authorization process in 2024.

4.3 List of Preparers

Chris Anderson, Archaeologist

Sage Dunn, Fisheries and Aquatic Habitat Biologist

Brad Higdon, Assistant Field Manager – Recreation

Susan Horton, Wildlife Biologist

Mike Lukens, Outdoor Recreation Planner (Former)

Sami Naibauer, Botanist/Ecologist

Gina Pearson, Planning and Environmental Coordinator

Carl Weinmeister, Outdoor Recreation Planner

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APPENDIX A

Developed Climbing Areas on Taos Field Office Managed Lands

Inventoried rock-climbing sites. (Mountain Project web site main source / <https://www.mountainproject.com/area/105868955/taos-area>)

Santa Fe County:

Diablo Canyon: BLM managed lands:

Winter Wall (23 routes)

Sun Devil Wall (10 routes)

Solar Cave (28 routes)

Styx (6 routes)

Taos County:

Rio Grande del Norte National Monument:

Bam Wall (unknown route #s, climbing known to occur, beginner/top rope area)

Bend Wall (21 routes)

Dead Cholla (39 routes) [16 new routes undocumented until 2/2025]

Vista Verde (54 routes)

John Dunn Bridge (65 routes)

Horsethief Shorty (1 route)

Miners Crag (42 routes)

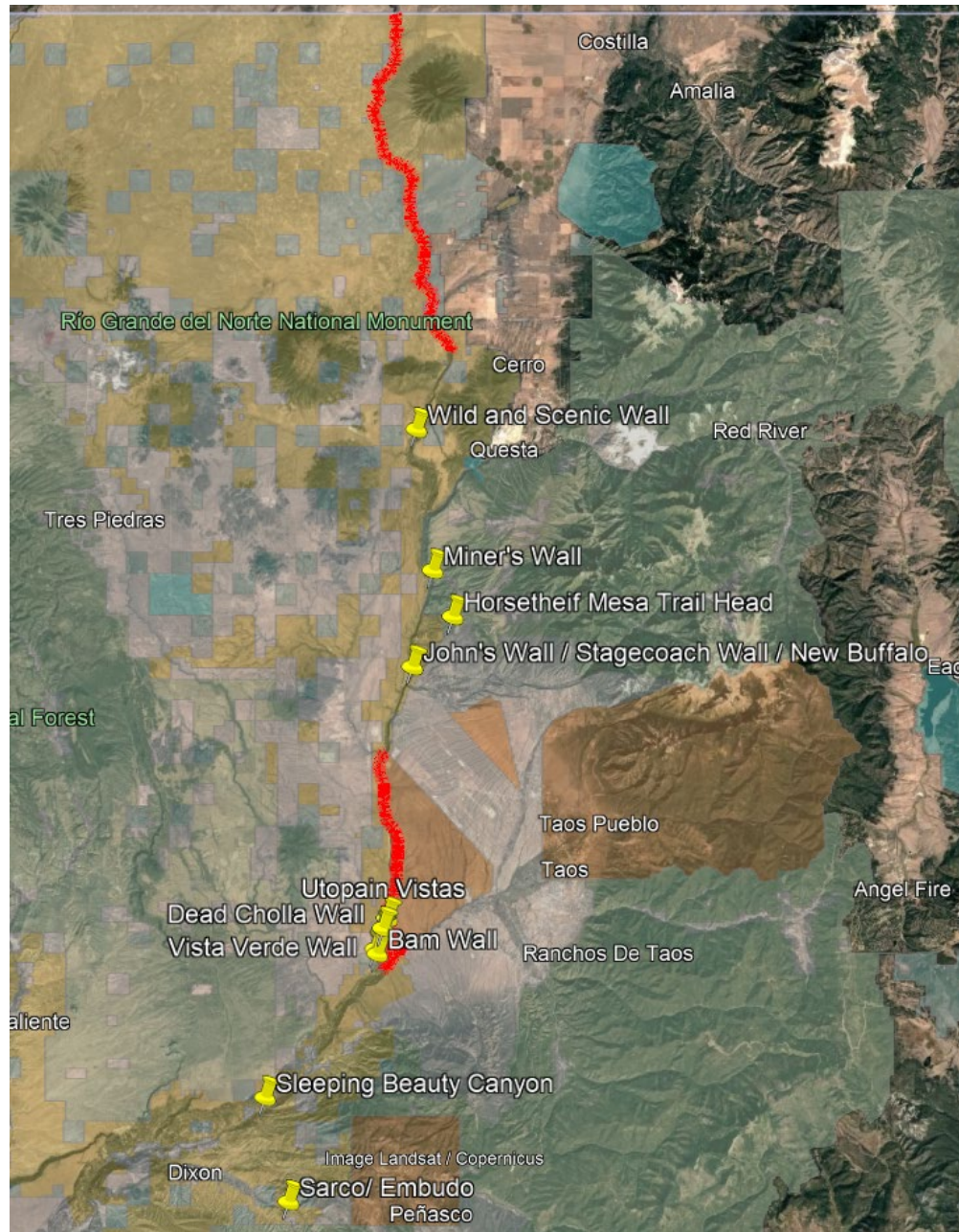
Utopian Vistas Wall/Area (143 routes)

Wild Rivers Recreation Area (19 routes)

Bouldering sites throughout Orilla Verde Recreation Area

Bouldering sites in Sleeping Beauty Canyon

Ojo Sarco/Rio Embudo (climbing known to occur, unknown quantity of established routes)



Red Zones: Upper Section: Proposed no fixed hardware placement from State Line to Sheep's Crossing Trail, both sides of river. Lower Section: Taos Pueblo land, from 1 mile upstream of Rio Grande Gorge Bridge to Confluence of Rio Pueblo, no hardware placement allowed.

APPENDIX B

Proposed sequence of events for fixed hardware replacement, establishing new routes and developing new climbing areas.

- Proponent brings BLM location map (photos) and description of hardware to be replaced (wall/route), new routes in existing area or maps of proposed new area for wall/crag development.
- BLM ID Team evaluate area and draw consensus if the new routes/site meets BLM management strategies as established in existing Resource Management Plans. (Step may be forgone if no issues are present {hardware replacement}).
- BLM Staff make field trips to proposed site and identify any potential issues or unmitigatable impacts.
- BLM ID Team reach consensus if routes may be added to existing crag or new site may be developed.
- Proponent is informed of decision in writing with any site-specific stipulations listed and discussed in person and on site if applicable. Six-month duration on authorizations.
- If routes/site can be developed, route developer(s) keep BLM Recreation staff informed of progress: routes, names, class rating, amount of hardware installed.
- If new routes are proposed to be developed outside previously evaluated areas, the authorization process would begin again.

Appendix C

BEST PRACTICES specific to BOLT REPLACEMENT

<https://safeclimbing.org/best-practices-for-hardware-and-placement>

- In general, bolts should be replaced by reusing & expanding the original hole whenever possible.
- Bolts are not added, except in unusual circumstances, such as the land manager requesting a bolted anchor to reduce wear on cliff-top trees. If bolts are added in these unusual circumstances, the general agreement of the local climbing community is essential.
- In certain circumstances, where the original bolt location is poor due to a variety of factors (such as rockfall, broken holds, etc), the bolt location may be moved. In these circumstances, again the local climbing community should agree, and the bolt should be moved a minimum distance that is appropriate.
- If an original hole is not re-used, patch and camouflage the original hole as best possible.
- Patch and camouflage any extraneous old bolt holes.

**Additional information on bolt placement and removal can be found at
<https://safeclimbing.org/bolt-removal-and-replacement-techniques>**