



Texas Parks and Wildlife Department

Enchanted Rock State Natural Area Rock Climbing Management Plan

State Parks Division, Region 3

Forms for requesting changes to climbing routes may be
downloaded at

www.CentralTexasClimbingCommittee.com

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Enchanted Rock State Natural Area

Rock Climbing Management Plan



1 Purpose

Enchanted Rock State Natural Area (ERSNA or “Enchanted Rock”) provides an ideal setting for rock climbing that is rare in Texas. The Texas Parks and Wildlife Department (TPWD) supports and wishes to sustain recreational use by rock climbers. Climbing is and has historically been very popular at Enchanted Rock both before and after it became a State Natural Area. A considerable number of people visit Enchanted Rock every year to participate in rock climbing and climbing-related activities. This popularity coupled with the actual and potential impact of these activities on natural resources, historical artifacts and on other Enchanted Rock visitors creates a requirement to actively and effectively manage those activities. The purpose of this plan is to provide a solid and sustainable platform for the management of rock climbing activities at Enchanted Rock.

This management plan should be reviewed and updated on a regular basis. The intent is to review the document at the same time as MOU for the Central Texas Climbing Committee (CTCC).

2 Goal and Objectives

The primary goal of this plan is to document applicable policies, procedures and guidelines that have historically been applied to managing climbing activities at ERSNA and to create a framework that allows equitable and sustainable use of the resource. Within this overall goal, the following objectives are addressed:

- ◆ Mitigate the impact of rock climbing on natural, cultural and historic resources, to preserve those resources for the future,
- ◆ Enable rock climbers to enjoy the freedom of the sport, without undue or unnecessary restriction,
- ◆ Maintain a positive experience for rock climbers and non-climbers alike in relation to climbing activities, and
- ◆ Build partnerships with climbers, climbing groups and commercial organizations in the management of climbing activities and facilities.

The development of this climbing management plan, its subsequent implementation, and potential future revisions are intended to provide a forum for public involvement, participation and collaboration. TPWD considers the long-term partnership with rock climbers and other interested parties to be a crucial component of an effective climbing management plan.

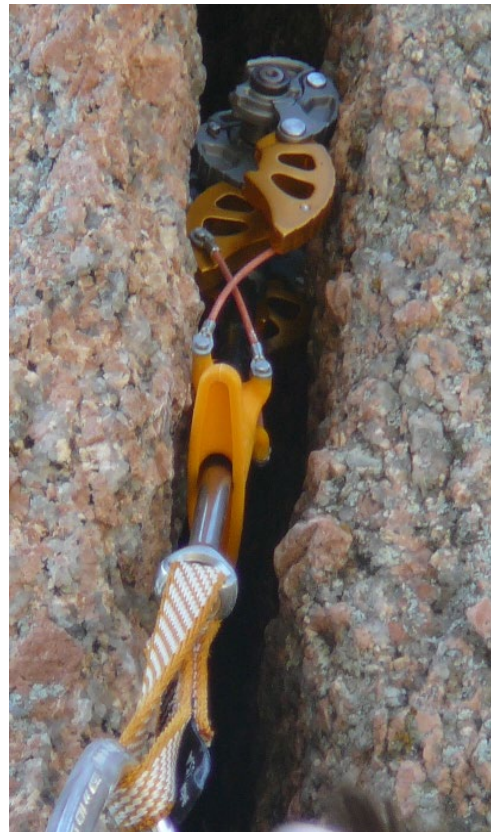
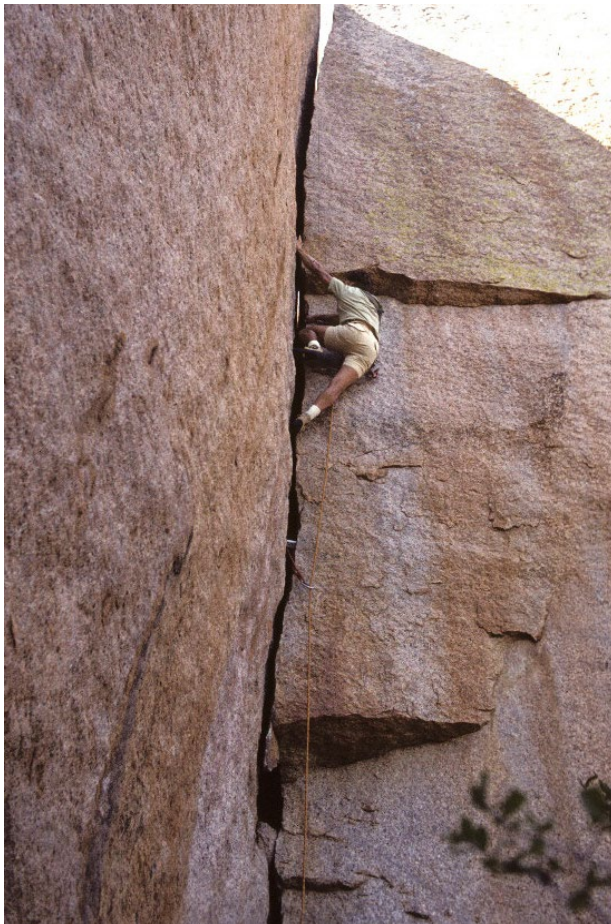
3 Authority for Resource and Recreation Management

The authority presiding over all activities and usage policies, guidelines and procedures at ERSNA at the Natural Area is the Texas Parks and Wildlife Department (the “Department”).

4 Description of Climbing Activity

The numerous granite formations of Enchanted Rock are in many ways ideal for rock climbing. The surface texture of the pink granite of Enchanted Rock and nearby formations is coarse-grained and extremely rough, with sharp edges and crystals being commonplace. In addition to many climbable cracks and other features, the rough texture creates interesting climbing challenges on many of the steep slabs and faces.

There are many cracks that enable climbers to ascend and to place removable “clean” climbing anchors for protection. Such protection is very strong when placed properly and typically doesn’t cause rock damage, and is preferred by many climbers. Placing



climbing protection is a specialized skill requiring considerable practice, and because of the limited height of the formations, placements must be frequent especially at the beginning of a climb to mitigate the risk of injury in case of a fall. Although pitons have occasionally been used at Enchanted Rock in the past, their use is outmoded due to the availability of improved clean climbing protection, and because the damage that piton placement and removal inherently cause to the rock is a violation of Natural Area rules.

On the steep slabs and faces, the absence of cracks and other features means that expansion bolts are often the only viable option for climbing protection. Climbers have traditionally minimized the number of bolts placed for a variety of reasons. Given that installed bolts are left in place, there is no ongoing rock damage due to their use after installation, and an installed bolt is typically much easier for climbers to use safely than a clean climbing anchor.

4.1 History

The history of technical climbing at Enchanted Rock began in the 1930s, and presumably scrambling and other activities involving ascent of the rock date back much further. In the early days of technical climbing, most of the moderate cracks and easy faces at Enchanted Rock were climbed. Over the years leading up to the early 1970's, Enchanted Rock became known as a good place for climbing, mostly among climbers living in Texas where other opportunities to climb were very limited. During this period Enchanted Rock was privately owned, and was accessible for climbing due to its operation as a private fee-based campground and park, owned by the Moss and Faltin families. Very little improvement was done to the area for camping or other purposes prior to it being purchased by the Department with the help of The Nature Conservancy and becoming a State Natural Area in 1978.

4.2 Early Development

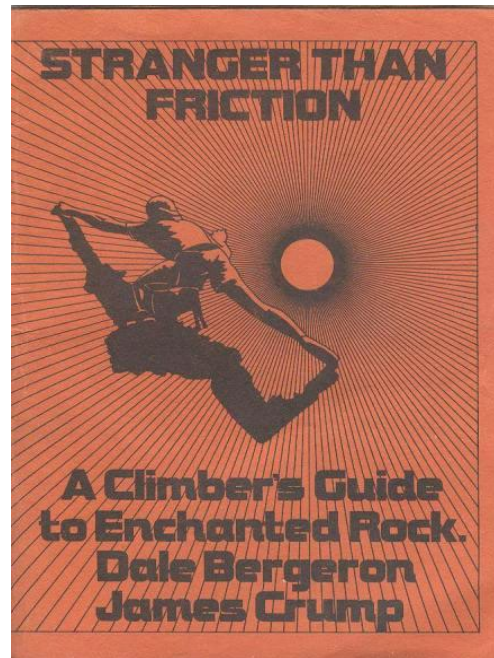
One of the first technical ascents at Enchanted Rock occurred in proximity to the current rock climbing route "Dome Driver". The ascent of this route, dating back to the early 1960's, employed the first known expansion bolts placed to connect the low angle slab below the overlap with "Beer Can Alley" above. The wide ascending diagonal crack system known as Beer Can Alley received its name from the numerous aluminum cans that became lodged when discarded from above. Five rudimentary bolt placements were used for direct aid through the steeper section of rock above the overlap that allowed climbers to safely reach the crack of Beer Can Alley, thus connecting these features. This original aid line was ultimately reconfigured as Dome Driver with fewer bolts.

In the late 1960's climbers began to transition from more primitive aid climbing to a "new" clean climbing ethic developed and refined in the Yosemite Valley. Around 1968, the longer low-angle slab route "Harder Than It Looks" was climbed free (i.e. using the anchors only as a safety backup, not as an aid to climbing) with the addition of two expansion bolts.

4.3 The Climbing Boom

In the early 1970s, there was considerable growth in interest among climbers, and new and harder climbs were developed at Enchanted Rock including the steeper and more technical bolted face climbs. These climbs typically employed a ground-up approach using “clean climbing” ethics developed by Yosemite Valley pioneers. The most notable of these climbs is “Ripple,” which was first climbed around 1975 and is still one of the park’s most popular routes.

Throughout the 1970s and into the 1980s, bolting was treated by most climbers as a last resort, to be used only when other means of protection were not available. Many climbers during this period had grown up in the sport through a school of clean climbing, which taught that bolts were to be avoided if possible. Bolts were placed on climbs starting from the ground up, at spots where it was possible for the lead climber to stand and hammer with a hand-held drill, which could take up to an hour or more over multiple sessions to place one bolt. The early climbing bolts were almost exclusively the ¼” diameter split rivet compression type, from 1” to 1 ½” long, with specially-made climbing hangers attached. During this time of clean climbing evolution, aid climbing became increasingly more technical and less utilitarian. The ascent of “French Route” in 1976 utilized innovative new piton technology known as the Realized Ultimate Reality Piton (or RURP) to climb a thin seam below the overlap. This route has since been bolted into a classic climbing lead.



Increasingly difficult first ascents were completed in the late 1970s, including landmarks such as “Orange Peel,” “Fear of Flying” and the classic bolted face climb “Stranger Than Friction” in 1978. This period saw a surge in the popularity of climbing and correspondingly increased popularity of Enchanted Rock as a place to climb and to explore new climbing possibilities. This trend continued throughout the 1980s, with many bold new climbs at higher levels of technical difficulty being completed by a growing and ever more dedicated community of climbers. During this time most of the recognized climbable lines on back side of the main Enchanted Rock dome were bolted and climbed, as were other difficult faces in other areas of the park. The publication of the original climbing guidebook to the area titled Stranger Than Friction in 1984 spurred increased development as climbers became aware of new climbing lines and expanding possibilities.

4.4 Evolution of Sport Climbing

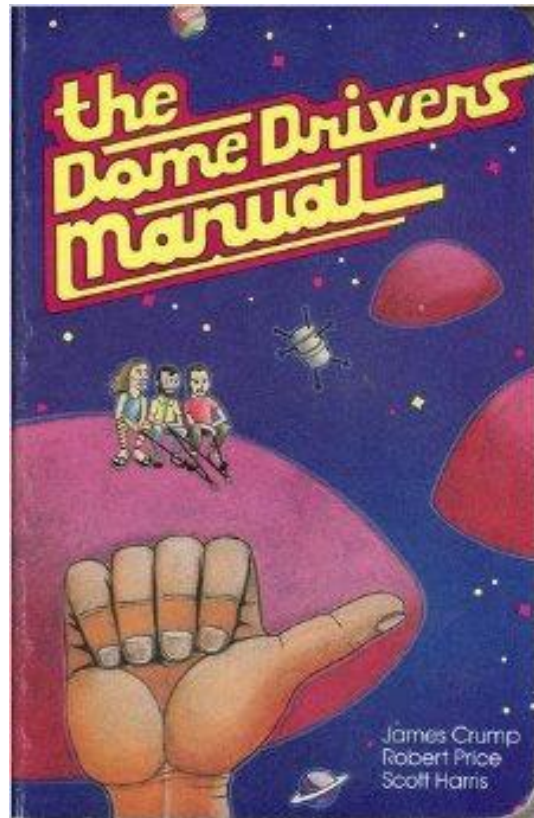
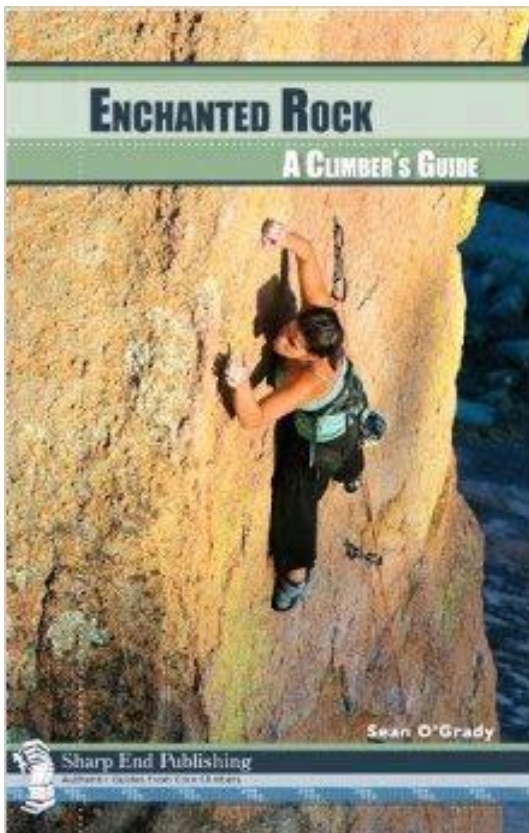
During the mid to late 1980s, a shift began to take place within the central Texas climbing community toward climbing steeper routes using increasing numbers of pre-placed bolts. The trend began in Europe, where bolt placement on rappel rather than on lead had become popular, partly because more climbs there were being done on limestone and other more fragile rock that was not well suited for placing clean protection. As this trend gathered momentum in the US, its impact was felt at Enchanted Rock when new routes were placed using top-down, rappel bolting methods where other traditional means did not suffice. This included shorter and very steep face routes with minimal holds like “Barracuda,” which remains one of the most difficult climbs at ERSNA. The climbing popularity of the park likely peaked, resulting in the development of high number of bolted face climbs, the establishment of professional guiding services as concessions, and publication of more detailed guidebooks informing climbers of the new standards being set.



At the same time, the trend toward rappel bolting of steeper climbs began to cause a shift of popularity in Texas toward limestone, and away from the granite of Enchanted Rock. Much of the limestone in central Texas previously had been largely ignored, and in the late 1980s places like Austin’s Barton Creek green belt and Reimer’s Ranch on the Pedernales River became popular among climbers as alternatives to Enchanted Rock. This coupled with the decreasing number of new route opportunities at Enchanted Rock led to a gradual decline in the number of new climbs being developed there, and eventually to a decrease in the number of climbers there in general. Climbing is still a very popular activity at Enchanted Rock and contributes significantly to attendance and revenue at the park, although it isn’t at the same height that it was in the 1980s.

4.5 Advent of the CTCC

In the late 1980s, the climbing community was particularly engaged in both the sport of climbing and also the social aspect of the sport. Climbing clubs in cities of Austin, San Antonio, Houston and Dallas all became very active with large rosters of members. The clubs often communicated not only within their own membership, but also with other clubs. In this context, the climbing community was able to collectively voice concerns to TPWD about the safety of existing bolting hardware and the need to improve climbing management. TPWD was aware of these safety issues and other climbing related concerns and sought to involve climbing expertise from the local community. This led to a collaborative effort between TPWD and the climbing community resulting in the Central Texas Climbing Committee (CTCC), a landmark advisory body that has since assisted TPWD in managing climbing activities at Enchanted Rock. This “community-based” climbing management model was recognized early-on by other park managers and has since been emulated around the nation. Much of the material herein simply comprises documentation of the procedures and guidelines that have been established and practiced by the CTCC.



The formation of the CTCC largely coincided with the January 1990 publication of the first comprehensive rock climbing guidebook for Enchanted Rock, The Dome Driver's Manual, which was also instrumental in conveying the vision of this climbing management model to the community. The first major task performed by the original CTCC membership, in consultation with TPWD per the MOU, was the replacement of most of the existing bolts at the park with new, stronger and more durable hardware. The CTCC has monitored and maintained the fixed climbing protection

at ERSNA since then, installed new anchors as requested by TPWD to mitigate impact on trees and other natural features, and has advised TPWD regarding applications for new fixed protection placements as a means to effectively manage the impact of climbing. In addition, the CTCC has implemented a limited retrobolting effort to address safety concerns on some routes by adding additional fixed protection. These retrobolted routes are typically selected based on community input and with the permission of the first ascensionist. In this manner, excessive risk is mitigated, and these select routes are rendered accessible to a larger number of climbers.

4.6 Growth of Bouldering and Sport Climbing

Since the late 1990's, the wide availability of indoor climbing gyms and artificial climbing walls has made climbing accessible to many more people than ever before. This has led to a surge in the popularity of both sport climbing and of bouldering (a form of climbing short and intense routes on boulders without ropes or climbing protection). The number of bouldering climbers carrying crash (landing) pads seen on a given day at Enchanted Rock has grown tremendously, and many new boulder problems have been climbed and documented. Two editions of the latest ERSNA climbing guidebook, Enchanted Rock, A Climber's Guide, were published, the first in 2003 and the second in 2011.

At the same time, there has been a growing interest in developing difficult new sport climbs at Enchanted Rock. Since sport climbing typically involves more sustained and difficult moves, the placement of closely-spaced bolts for protection has become an accepted practice. Because most of the remaining opportunities for such routes at ERSNA occur on formations less than 50 feet tall, this interest presents a new set of challenges for climbing management, such as the proliferation of densely spaced bolts in highly visible locations. In addition, the rise of social media and other forms of electronic communication, such as online forums and blogs, have provided a convenient platform for climbers to express a wide range of differing opinions. These forums allow the freedom to debate not only technical, but also ethical issues related to the sport of climbing. Therefore, climbing ethics vary widely and continue to morph as societal attitudes change. This may create not only opportunities for the sport to grow, but also challenges in the management of climbing resources.

4.7 National and Regional Importance

Enchanted Rock is quite important as a resource to many central Texas climbers, and it is one of a few places in a multi-state region that offers the opportunity to effectively practice skills and techniques that are applicable to climbing in the mountains or at major climbing destinations such as Yosemite Valley. What has also been especially notable and influential about climbing at ERSNA is the formation and operation of the CTCC as a management advisory body to TPWD. The Department set a national precedent and an outstanding example by forming the CTCC as the first climbing advisory body of its kind in the United States. Since then numerous other advisory bodies have been formed following the functional model provided by the CTCC, and it has proven over the years to be an efficient and effective partnership between climbers and TPWD.

4.8 Who Are the Climbers?

The majority of climbers at Enchanted Rock are visitors from nearby cities such as Austin and San Antonio, as well as from places somewhat further away that offer little local outdoor climbing, including San Antonio, Dallas / Fort Worth and Houston. Many of them have been coming to Enchanted Rock to climb for a number of years, as it is the only place in this part of the country that offers such a variety of high-quality granite climbing routes. There are also many people who come to Enchanted Rock to learn about climbing, either through one of the commercial guide services or with the Scouts or other groups offering instruction with TPWD's approval.

The range of people who climb at Enchanted Rock is highly varied, of all ages and descriptions. Because there are climbs available at all levels of difficulty, there is no one group or type of climber that predominates. Everyone from the beginner just scrambling over the rocks for the first time to the experienced climber who enjoys the sport at the highest levels of difficulty may be seen climbing at Enchanted Rock.

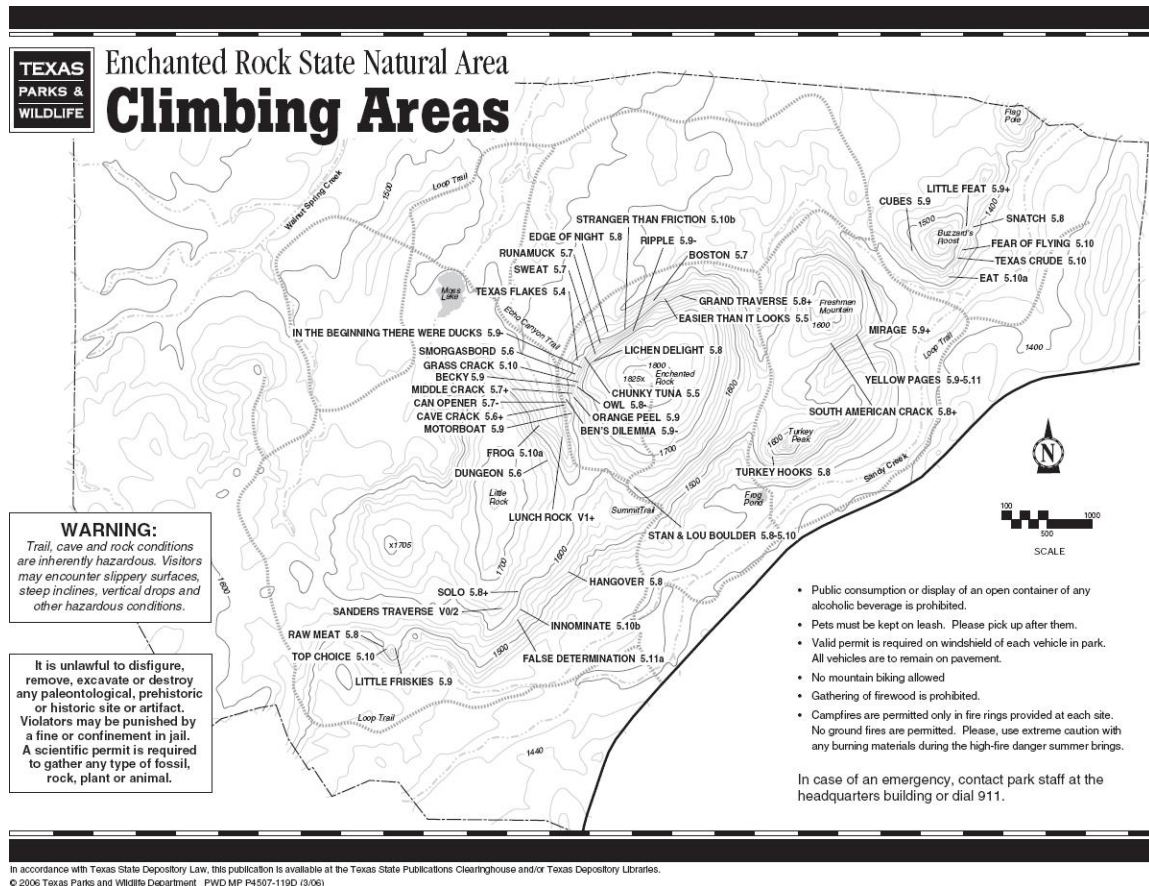
4.9 Existing and Potential Climbing Opportunities

Although the climbing potential at Enchanted Rock is substantial it is not unlimited, and the majority of the area has been explored and developed with climbing routes. The largest collection of routes in any one area is on the northwest side of the main Enchanted Rock dome, where the overall steepness and height of the face is excellent for climbing. There is also a large collection of routes in Echo Canyon, predominantly on its north slope, among the many boulders and domed faces above the canyon floor. Numerous other established routes exist across the entire Natural Area, both on boulders and on the domes.

Although a large portion of the climbing possibilities has been previously developed, there remain opportunities to add new climbs in areas that may be of interest and enjoyment to a wide range of climbers. One of the major benefits that can be realized by thoughtful development of new climbs especially in lightly used areas at the Natural Area is the potential reduction of crowding in more popular areas such as Echo Canyon. There are locations that currently have few climbing routes and are not often frequented by climbers where there is great potential even for large groups to climb or to hold classes, if new routes are developed with that possibility in mind.

4.10 Maps/location of climbing resources

Below is the official map showing climbing resources at ERSNA:



5 Summary of Climbing Management Issues

As a result of high volume of visitation from both rock climbers and other visitors, there are number of management issues that must be addressed in order to meet the goals and objectives of this plan, with the ultimate goal of preserving the resources for future generations. In this Section, we identify some of the key management issues that are specifically addressed by policies and procedures presented later in this document.

5.1 Competition for popular routes/areas

Due to the unique characteristics of some rock climbing routes including: location and shade, relative proximity to other routes, relative difficulty, amount/spacing of fixed protection and anchors, and other factors, these routes are more popular with rock climbers and/or guided climbing groups. When a group becomes established for a long duration in a particular climbing area or on select routes, it may become unavailable on an extended basis to others wishing to climb the same routes. Although most people are fairly accommodating and share the resource well, there are occasions where competition for popular climbing routes will create a conflict. Where reported conflicts arise, TPWD

should collect necessary information related to the conflict, such that the situation can be analyzed for future remedies. The CTCC has the responsibility to consult with and advise TPWD on potential remedies for conflicts arising on popular climbing routes or in popular climbing areas.

5.2 Large groups impacting resources

In cases where large groups of climbers and guided groups concentrate in specific locations, the impacts to resources may be greater than otherwise incurred. These impacts can occur in the form of enhanced erosion and displacement of rocks & boulders, destruction or damage to vegetation, discarded litter or trash, unsafe horseplay resulting in injuries and/or rescue. Group leaders and guides should be responsible to instruct group/class members in appropriate behavior and conservation ethics. Where impacts to the resource are noted/reported or prevalence of injuries is sustained, TPWD should assess the specifics of the situation and may consult with CTCC on appropriate remedies.

5.3 Lack of training/expertise

Safety is a primary concern of TPWD for all users of ERSNA. Rock climbing is an activity with a degree of risk that is relative and proportional to the amount of training and expertise of the participant. Especially in group or guided climbs, where participants are likely much less experienced, the potential for negative outcomes increases if not adequately supervised by trained and experienced leaders. Guide services are assessed on their proficiency by TPWD and controlled by concession contract. Other groups, such as youth organizations, may/may not have the necessary skills and experience to maintain a safe rock climbing experience. In some cases, unguided groups may also lack the necessary experience to climb safely, resulting in an unnecessarily high degree of risk for negative outcome. Climber education is a key component of reducing these risks. TPWD should develop processes and procedures to ensure leaders of groups, especially youth, are qualified and meet industry standards and skills for leading/teaching rock climbing.

5.4 Inappropriate/Unauthorized Hardware and Fixed Protection

The CTCC specifically evaluates the type and location of all fixed protection placed on climbing routes at ERSNA. The proposed hardware is evaluated for appropriate material strength, anchorage mechanism and other factors to provide assurance that it will be adequate to sustain the force of falls and to arrest the climber. The CTCC also periodically evaluates the condition of existing fixed protection. The location of fixed protection is evaluated with respect to the spacing and climbing features of the route and the proximity to other existing routes. When the route evaluation process is subverted and unauthorized fixed protection is installed, the CTCC should promptly document the illegal installations and inform TPWD of the discovery. The CTCC will assist TPWD in removal of the unauthorized fixed protection and in the restoration of the rock surface to the extent possible.

5.5 Visual impact of fixed protection

All fixed protection installed for rock climbing is not natural to the environment and there is an impact to the visual aesthetic of the rock surface. Fixed protection is typically metallic and therefore has a highly reflective quality if not well coated/painted or otherwise camouflaged. The CTCC should prescribe that fixed protection be appropriately coated or painted to reduce the visual impact on the rock surface to the extent possible. Periodic assessment of existing fixed protection should include an evaluation of the condition and wear on the exterior coating. The CTCC will provide TPWD with an annual report on the inspection and/or status of fixed protection on all climbs. Additionally, any fixed protection that is replaced shall be noted in the report to include date of removal, name of person removing/replacing, picture (before and after) and location.

6 Description of Climbing Management

Before becoming a State Natural Area, under the purview of TPWD, Enchanted Rock's operation as a private park didn't involve any management of climbing activities. After its acquisition by the Department and re-opening as ERSNA, most climbing remained unrestricted, although a small set of management policies were established regarding the use of expansion bolts and other fixed protection.

The current era of active management of climbing at the Natural Area began with the establishment of the CTCC. Leveraging the CTCC as an advisory body, TPWD initiated acceptance and evaluation of applications for fixed climbing protection. The set of procedures and guidelines documented herein comes primarily from practices that have been established and applied by the CTCC in advising TPWD, and from its experience with maintaining fixed protection hardware installed on established climbs.

7 Climbing Management Policy Guidelines

This Section describes specific guidelines regarding the management of climbing activities at ERSNA. The primary emphasis is on issues that have a direct impact on natural or historic resources, or on Natural Area users. Such issues primarily include fixed climbing protection placement and maintenance, and the resource and user impact resulting from climbing activity, from foot traffic associated with climbing, and from related peripheral activity in the vicinity of climbing.

Any alteration of the rock or of other natural resources at ERSNA without the express permission of TPWD is prohibited. In particular, except for the placement of fixed climbing protection approved by TPWD as described herein, any alteration including **chipping, chiseling, drilling, sculpting, gluing, dry-tooling or other activity causing permanent modification or damage to the rock for climbing purposes is not permitted under any circumstances.** The placement and maintenance of fixed climbing protection is permitted only based on approval by TPWD as described in Section 7.3.

7.1 Clean Climbing

Most climbing areas at ERSNA offer clean climbing opportunities, often in the form of crack climbs protectable by removable artificial chocks and camming devices. Clean climbing, having no permanent impact on the area's natural resources, is encouraged and is generally unrestricted, except in special cases where location-specific restrictions may apply. Such restrictions will typically be temporary, and even in the absence of such a restriction, climbers must always be observant of wildlife activity, and consciously avoid any undue disturbance of local flora or fauna.



Modern camming device placed
as climbing protection in a crack

7.2 Climbs Using Fixed Protection

The placement of any form of fixed protection for climbing is controlled by TPWD through an application and approval process, as described in Section 7.3. Any placement of fixed hardware or software requires that the individual installing the placement have in their possession an approved application bearing their name. Climbers are urged to make every reasonable effort to promptly remove all other equipment placed in the process of climbing.

It is understood that sometimes a normally removable piece of gear may inadvertently become difficult or impossible to remove, and in such a case, climbers are asked to notify TPWD staff and/or the CTCC without delay of the nature and location of the stuck gear. This is both a matter of environmental impact and of safety, since abandoned gear may interfere with subsequent gear placement attempts, and its strength may not be possible to assess.

7.3 Fixed Protection Addition or Modification

The placement or modification of fixed climbing protection at ERSNA is allowed as defined in this Section. Alteration or destruction of vegetation, wildlife or other natural

resources at ERSNA for any purpose without specific permission from TPWD is strictly prohibited. Any modification or destruction of the rock for climbing or any other purpose without specific written permission from TPWD is illegal and may incur fines and/or other consequences as specified by Texas state law.

7.3.1 Departmental Fixed Protection Request

If TPWD submits a request for the addition or modification of fixed climbing protection, the CTCC may respond and provide recommendations on a different course of action. The CTCC and TPWD will cooperatively maintain a process and appropriate forms to support such requests, and CTCC will provide TPWD with relevant feedback regarding submitted requests and support their prompt implementation. The most common reason for a departmental request historically has been to place fixed rappel anchors intended to reduce the impact of climbing activities on natural resources such as trees. TPWD may request the addition, modification or removal of fixed protection as needed for this or other reasons.

Upon receipt of a request to add or modify fixed protection from TPWD, the CTCC will provide feedback as soon as possible, using the response form shown in Section 14. The response form will include space for detailed CTCC feedback and recommendations. The CTCC response will be forwarded to TPWD for final disposition. Once the CTCC receives a final decision from TPWD, it will act promptly to implement the request.

7.3.2 Fixed Protection Application Process

Any placement of fixed protection at ERSNA must be based on written approval from TPWD. The application process is described in this Section.

7.3.2.1 Fixed Protection Application Form and Requirements

The CTCC will maintain a written application form to be used when applying for the placement of fixed protection at ERSNA (Section 12) This form must be used by all parties who wish to place any fixed protection, or to take any climbing-related action which permanently alters any natural formation at the Natural Area, except as stated in Sections 7.3.1 and 9.2. Submitted applications shall use the form provided. Information required in the form:

- ◆ Precise location(s) of the proposed fixed protection, including the general area, nearby existing climbs, and specific position of each fixed protection placement.
- ◆ Specific type and size of hardware, installation procedure and adhesive (if any) to be used for each proposed fixed protection placement and any coating/painting or camouflage provided.
- ◆ Printed names and signatures of all applicants. Only an individual whose printed name and signature appear on an approved application may place fixed protection per that application.

An individual may have at most two applications in an approved-unexpired status or in the review and approval process at any given time. An application may be withdrawn

from consideration prior to its approval, and an approved application may be withdrawn at the request of all applicants whose names are on the application.

7.3.2.2 Fixed Protection Application Review and Response Schedule

The application form provided by CTCC will include information about submission deadline(s) and the schedule for application consideration. CTCC will render a decision according to the stated schedule and will inform the applicant(s) and TPWD of their decision as soon as possible, using a standard response form as described in the following subsection.

Upon receipt of a final decision from TPWD, CTCC will notify the applicant(s) of the decision as soon as possible. This notice will include a written authorization to place fixed protection, naming the applicant(s), if the TPWD decision was for approval.

7.3.2.3 Fixed Protection Application Response Form

An evaluation and response form, including a record of the CTCC members' votes and space for TPWD comments and signatures, will be included with each application when it is submitted to the Department for final disposition. TPWD will review all applications and render a decision affirming or denying the application. TPWD will include their resource review and comments on the evaluation form.

7.3.2.4 Fixed Protection Application Review and Evaluation Guidelines

The CTCC membership will review and evaluate each submitted application, and vote to approve or decline the application prior to forwarding its conclusion to TPWD. CTCC approval of an application requires an affirmative vote of at least two-thirds of the CTCC membership, except as described in Section 7.3.3. It should be noted that this is not related to the size of the quorum at a given CTCC meeting, since the two-thirds majority vote requirement applies to the entire CTCC membership. In addition, **a CTCC member may not vote for approval of any application bearing that CTCC member's name as an applicant or co-applicant.** CTCC will submit the application response to the superintendent of ERSNA as soon as possible after the CTCC vote is finalized.

Each application will be evaluated by the CTCC, taking into account any specific resource impacts and other non-climbing concerns as well as the qualities of the application from a climbing perspective. The latter assessment takes into account safety factors, rock quality, the proximity to other climbs, the inherent impact of placing fixed protection for climbing, the applicant(s) prior experience with anchor placement, and other relevant information. The CTCC may, in some cases, suggest modifications to an application to improve its viability and may allow the applicant(s) to make such changes before a decision is made.

Each application will be given all due consideration, and no application will be declined without cause or explanation. Neither will any application be approved without due process and careful assessment of its impacts and potential impacts, both direct and indirect, on climbers and climbing resources, on other natural resources, on ERSNA users in general, and on wildlife. The CTCC may in some cases discuss questions of potential resource or other impacts with TPWD prior to making its decision.

7.3.2.5 Application Guidelines

The following guidelines will be used to determine whether an application is approved or declined. The impact of fixed protection placement, of climbing itself and the associated foot traffic to and from climbs as well as other direct and indirect influences all must be assessed and considered.

Application Assessment Guidelines:

1. Of special concern in the evaluation of an application for fixed protection is the possible destruction of *endangered or rare vegetation*, of *animal habitats*, or of important *cultural or archeological artifacts*, as these are overriding concerns that cannot be overlooked. In most cases, the immediate proximity of a proposed route to natural resources such as these may create a sufficient risk to justify declining an application without further evaluation, and seldom can this kind of impact be mitigated by making modifications to the application.
2. **Erosion** is also a prime concern, and some areas are especially fragile and subject to damage due to increased foot traffic. One clear example of such fragility can be seen on the steep hillside below the base of Turkey Peak to the southeast. Often erosion concerns can be mitigated by appropriate trail development, and in such cases an application may either be approved with the caveat that trail work in the area will be needed, or may be declined with the qualification that once appropriate trail work is accomplished, the application may be resubmitted with a greater likelihood of approval.
3. Increased **climber safety** is the fundamental justification for placing any fixed climbing protection. However, given that climbing is an inherently risky activity and that some degree of risk is unavoidable, the decision about a given application will not normally be based solely on the degree of risk involved in climbing the route as proposed. This is a matter of personal judgment, and it is understood that any climber must make that judgment for himself or herself. The intent is explicitly not to “make climbing safe,” since it is inherently impossible to eliminate all of the risk involved in climbing.

An application whose implementation may create a substantial risk to bystanders – possibly due to the proximity of unstable rock – will be declined. Suggested changes to mitigate risk may be suggested for incorporation into modified and resubmitted application. If a proposed fixed protection placement’s integrity may be adversely affected by local rock quality or other physical factors, again the application should be suitably amended to avoid such problems, or the application declined.

The criteria for assessment of risk to a climbing party will be based primarily on the ability to judge that risk prior to encountering it while climbing. In other words, if the risk involved in climbing a proposed route is apparent to a climber using sound judgment prior to climbing it, then the risk alone will not normally result in an application being declined. However, if a proposed specific placement of fixed protection is such that it may significantly increase the risk to a climber or a belayer, or may lure a climber or belayer using sound judgment, proper climbing equipment and techniques into a substantial life- or limb-threatening risk that they would not normally be expected to anticipate, then the application may be declined for this reason.

4. **Fixed protection density** and **route density** must be kept within acceptable limits. Using fewer fixed protection placements for a route (within reason) is generally preferred because it reduces the overt destructive impact to the rock as well as visual and other aesthetic impact. Similarly, placing multiple climbing routes very close together (for example, near enough to substantially share climbing holds between adjacent routes that

are not specifically variations of a single route) may create undesirable impact both to the area's resources and aesthetics. High density also generally increases the likelihood of crowding and logistical complications for climbers, and this may contribute to safety hazards that would not otherwise occur. While density issues by themselves may not represent overriding concerns that necessarily rule out approval of an application, they must be considered along with other factors in reaching a decision.

5. Given the fact that ERSNA is a State Natural Area, coupled with the traditional nature of climbing at Enchanted Rock, a wide proliferation of climbing routes having closely spaced bolts should be avoided. Avoiding high density both in terms of the locality of routes and of fixed protection in general will help to moderate impact.

With the increasing popularity of **bouldering** at Enchanted Rock, it is important to recognize bouldering as a valid recreational pursuit in its own right. If a proposed climbing route is less than 25 vertical feet from base to top, serious consideration must be given to leaving the rock unaltered as a boulder problem, or perhaps placing top anchors only. Exceptions may include climbs with rocky and uneven landings or other factors that make bouldering or top roping impractical or unsafe. However, even in such cases the traditional nature of climbing at Enchanted Rock as well as the visual impact of additional fixed protection placed close to the ground must be carefully considered.

TPWD regularly evaluates the impact in all climbing areas. As such, TPWD may establish Top Anchor Only Zones, Bolt Free Zones, or No Climb Zones. See Section 7.4.

6. **Hardware quality and durability** are critical to the continued strength and safety of fixed protection placements over time. Specific current guidelines will be provided on the application form, and if an application isn't sufficiently clear about the hardware intended for proposed placements, or if the proposed hardware doesn't meet currently established standards or otherwise is deemed unsuitable for the location of a proposed placement, then the CTCC will suggest appropriate changes to the application as a condition for approval. Consideration shall be given to the application of a coating or paint camouflage to the fixed protection in order to reduce visual impact.

7. **Applicant experience** with the placement of fixed protection of the type proposed in an application must be sufficient to ensure that sound decisions are made and that proper installation procedures are used. If an applicant has insufficient verifiable experience with placing fixed protection of the proposed type in rock such as that found in the proposed placement location, then the CTCC may either decline the application, or approve the application with the caveat that a CTCC member must be present to provide supervision and guidance when the proposed fixed protection is placed.

8. There may be questions about a proposed route's **viability** as a climb. If the proposed route has never been climbed, or at least all of the climbing moves on the route previously accomplished (not necessarily contiguously), then the application may be declined if in the CTCC's judgment it is unclear that the climb can be completed by the applicant(s). This doesn't represent an absolute requirement for a route to be climbed before an application for it is submitted and approved, since it may be apparent by other means that the route is climbable.

The assessment and evaluation of other application issues not specifically discussed in the above guidelines is often more subtle and hence more difficult than much of the foregoing. Given the impracticality of defining guidelines for the infinite variety of scenarios that may arise, understanding and evaluating these issues is left to the judgment of the CTCC membership and TPWD.

7.3.3 Application for Additional Fixed Protection (“retro”) or Existing Placement Modification or Removal on an Established Climbing Route

An application for the addition, removal, or other modification of fixed protection of an existing route (other than routine maintenance) may be submitted for a route that is not designated as a historic route. The guidelines in this Section pertain to any proposed fixed protection that is close enough to be within reach of a climber ascending the route, even if the application refers to a different route. Generally, the first ascent party retains veto rights over any such modifications to an existing route that has been legitimately established, except in rare cases as described below. If the first ascent party approves of a proposed modification, then the application will be evaluated using the criteria described in Section 7.3.2.4, and a decision made and documented following the procedure described in Section 7.3.2.2.

In the absence of available contact with the first ascent party, the CTCC may act on an application for existing route modification if 1) the CTCC is satisfied that a diligent good faith effort has been made by the applicant(s) to contact the first ascent party, and 2) a period of two months has elapsed since the application was submitted, during which period public input about the proposed modification has been actively solicited and collected for review. In such a case, a unanimous affirmative vote of the CTCC membership is required for application approval. Subsequent to a CTCC decision on such an application, the procedure described in Section 7.3.2.2 will apply.

Exception: the CTCC will act on a Departmental request to modify an existing route (see Section 7.3.1) without the approval of the first ascent party, or in spite of their explicit disapproval. This may occur if in TPWD’s view a compelling reason exists to take action to modify an existing route, such as overriding resource or safety concerns.

7.3.4 Application Resubmission

An application may be resubmitted if 1) the application was previously approved and the approval expired without the approved hardware being installed, or 2) the application was previously declined, and has either been substantially revised or circumstances affecting the application’s evaluation have significantly changed. In the absence of convincing evidence of a change favoring its reconsideration, an application that was previously declined by the CTCC or TPWD will normally not be approved.

7.3.4.1 Approved Application

A previously approved application may not be resubmitted until after the approval period (as specified on the approval form) expires. If the specified approval period expires without the approved hardware being installed or if some but not all of the hardware has been installed, then a new application is required to complete the installation. Such an

application for any or all of the previously approved fixed protection may be submitted at any time after expiration of the prior approval period.

7.3.4.2 *Declined Application*

An application for fixed protection on a climbing route that has previously been applied for and specifically declined by TPWD will not be considered. An application for fixed protection on a climbing route that has been previously applied for and declined three (3) times by the CTCC will not be considered. An application for a route that was previously declined by the CTCC (but not specifically declined by TPWD) may be resubmitted as many as two (2) times (up to a total of three submissions) if at least one of the following conditions is satisfied:

1. A previously declined application may be resubmitted if modifications are made that substantially impact application evaluation. Such modifications cannot be merely superficial and must have significant impact favoring a change of decision on the application. This may include altering portions of the climbing route from what was stated on the previous application, changing the number and/or the location of fixed protection applied for, etc. The resubmitted application must be supplemented with a clear explanation of the important changes and a convincing demonstration of their positive impact on the viability of the application.
2. A previously declined application may be resubmitted without significant modification **if external circumstances have changed that substantially affect the application's evaluation**. In such a case, application resubmission must be supplemented with material that clarifies the new circumstances in terms of how they affect the application, explaining how and why the change(s) support changing the evaluation to approve an application that in the past was declined.
3. A previously declined application may be resubmitted without significant modification **if at least four (4) years have elapsed since the application was declined**. In such a case, application resubmission must be supplemented with material that clearly explains why the application should be reconsidered.

7.3.5 **Historic Route Designation**

Some climbing routes have special significance in the history of a climbing area, in that they represent breakthroughs or other game-changing differences from previous ascents. Such routes at ERSNA may be given "historic route" designation in order to protect them from future addition of new fixed protection or other possible modification that would detract from their historic character. Historic route designation may be applied for, and applications will be evaluated as described in the following subsections. An application to modify or to add fixed protection on a climb that is designated as a historic route will not be considered, including an application for any fixed protection that is close enough to be within reach of a climber ascending the historic route.

7.3.5.1 Historic Route Application Form and Requirements

The CTCC will maintain a written application form to be used when applying for a historic route designation at the Natural Area (see Section 15). Submitted applications for historic route designation may use the provided form or any variant thereof, as long as the following information is included (no exceptions):

- ◆ Precise identification of the proposed historic route, including the general area, name of the route, and nearby climbs.
- ◆ Rationale supporting the historic nature of the route, describing the history of its establishment and original ascent, names of the first ascent party, and any other information relevant to the decision based on the criteria discussed in Section 7.3.5.3.
- ◆ Printed names and signatures of the applicant(s).

7.3.5.2 Historic Route Application Review and Response

An application for historic route designation will be posted for public review as described in the following Section and will be subsequently reviewed by the CTCC based on the information in the application and on public input received. The CTCC decision, including reasons for approving or declining the application, will be recorded and forwarded to TPWD for final disposition as soon as possible.

7.3.5.2.1 Public Review

When an application for historic route designation is received, it will be posted, and public input solicited and collected for review for a period of three (3) months prior to a vote being recorded. During this period a public input form will be made available to all ERSNA visitors who have signed a TPWD climbing release form. The public input form for a historic route designation will include an opportunity to register an individual “yes” or “no” opinion as well as an indication of whether the climber has climbed the proposed historic route and space for general comments. A form for public input is provided in Section 16.

During the public review period and until a decision is reached, applications to modify or add fixed protection on the proposed historic route will be treated as if the historic route designation is approved. The CTCC will vote on the application and forward its decision to TPWD as soon as possible after the end of the public review period.

7.3.5.2.2 CTCC Review and Decision

A historic route designation approval requires a unanimous vote of the CTCC Board of Directors and subsequent approval from TPWD. CTCC will review all public comments received and will take it closely into account in its decision.

7.3.5.2.3 Application Response Form

The final decision will be recorded on a form containing the route’s name and location, summary of the public vote and comments received during the public input period, and the details of the CTCC voting results. Rationale will be included describing the reasons

for the decision to approve or decline the application. The completed response form will be conveyed to the applicant and will be posted for public viewing for a minimum of at least three (3) months.

7.3.5.3 Historic Route Application Review Criteria

A historic climbing route stands out from other routes in terms of the character of its features and setting, relative difficulty at the time it was established, quality of the climbing experience and other less tangible aspects. Climbs that set significant new precedents in terms of difficulty and other metrics are potential candidates for historic route designation. Difficulty alone isn't often sufficient, and other factors must contribute to the overall quality of the route for it to be considered historic. In general, a historic route will have been recognized as a landmark climb at the time or soon after it was established, and its quality and desirability will have proven to be sustained over time.

Since many of the factors that contribute to this decision are subjective, it may seem that historic route designation is a difficult decision to make, but consensus on this question among climbers who know a route and its history is often easy to attain, and rarely controversial. The process defined herein is based on identifying that consensus.

7.3.5.4 Historic Route Application Resubmission

If an application for historic route designation is declined, the route may not be resubmitted for historic route designation for a period of one (1) year after the final application decision is communicated to the applicant.

7.3.5.5 Historic Route Designation Removal

In general once assigned a historic route designation will not be removed except under extraordinary circumstances. If however it becomes known that a historic route designation was approved based on false or inaccurate information that has substantial bearing on the establishment and historic character of the climbing route, then the CTCC may at its discretion reconsider and vote to remove the historic route designation. Removal of an approved historic route designation requires a unanimous vote of the CTCC membership and written approval from TPWD. Should such a situation occur, the CTCC will document the reasons for reconsidering historic route designation and will forward its recommendation to TPWD for final disposition.

7.4 Bolt Free and Top-Rope Anchor Only Zones

There are certain areas of the park that have been historically considered by both TPWD and the climbing community to be “bolt-free” and/or “top-rope anchors only” areas. Generally, due to the presence of ample crack climbs, beauty and aesthetics of the area and the desire to keep visual impacts of fixed protection to a minimum, these areas have historically been off-limits to bolting activity with the exception of top anchors. Top anchors have been added to some of the climbs to improve safety, facilitate top roping activities, and/or to reduce impact on trees and vegetation. The zones designated under this plan are listed below.

7.4.1 Bolt Free Zones

- **Fear of Flying Alcove** – the prominent dihedral located on the east side of Buzzards Roost forming the 60 ft. off-width crack known as *Fear of Flying*. The alcove begins on the south end at the climb *Texas Crude* and extends northwest toward *Fear of Flying*, then northeast along the opposite wall of the dihedral to the edge of the rock outcrop. This area includes both sides of the dihedral. [N 30°30'38.5"; W98°48'28.3"]
- **Split Rocks Area** – the 25 ft. boulders located just above the main camping area on the flank of Little Dome, below the Kingdom of Zilch area. These boulders appeared to have split apart from a single boulder forming an obtuse interior angle on the lower boulder. The area is popular for bouldering and there is no easy access to the top. [N 30°29'56.2"; W 98°49'19.2"]

7.4.2 Top Anchor Only Zones

- **Triple Cracks Area** – located on the southwest portion of the main dome (backside) beginning on the north side of the area enclosed by Rappeller's Rock and extending to the south toward *Grass Crack*, then extending west across the triple cracks to the far west end of *Owl Crack* encompassing some of the most popular moderate crack climbs in the park. [N 30°30'22.6"; W 98°49'16.8"]
- **Carnivore Boulders** – located north of the loop trail and resting on the southwest flank of Little Dome, this entire outcropping of (about 6) large boulders has numerous crack climbs and pitched aretes, and is generally accessible for top rope setup, with exception of the main boulder. [N 30°29'53.6"; W 98°49'39.6"]

In these zones, the placement of fixed protection considered by the CTCC and TPWD will be strictly limited based on the zone definitions.

7.5 New Zone Designation

At the discretion of TPWD, areas may be added or subtracted from the above designations. In addition, TPWD may add new zone designations such as, Climb Free Zone or No Climb Zone. These new designations may be implemented to protect a particular natural or cultural resource that was previously unknown. In either case, the CTCC will be notified of the impending change.

A pending new zone designation will be clearly defined as to 1) the nature of and rationale for the imposed restrictions, and 2) the specific geographic location and boundaries of the zone. Public feedback regarding the new zone designation will be solicited, collected and reviewed by the CTCC and the TPWD as early as is practical (see Section 18). If possible, this public feedback and review process will be completed prior to the implementation of the new zone.

8 Group Climbing Activities

There are several opportunities for individuals/groups to participate in climbing activities either through personal knowledge of the activity or utilizing one of the authorized climbing concessionaires.

Individuals may climb at ERSNA through unguided climbing activities. Everyone participating in the activity will need to sign a waiver located at the headquarters building. Unguided climbers are responsible for knowing the rules and regulations regarding climbing activities at ERSNA.

8.1 Commercial Climbing Guide Services

ERSNA is fortunate to have highly competent climbing concessionaires. All concessionaires are authorized to perform certain services at ERSNA. The names and contact information is listed on the home page of the TPWD Enchanted Rock website. The concessionaires are listed in alphabetic order and staff cannot recommend any one of the providers. All concessionaires are bound by a concession contract in which certain rules and policies are defined for group climbing activities.

8.2 Non-Commercial Group Climbing Activities

Non-Commercial group climbing activities may be performed at ERSNA; however, this activity is limited to four (4) climbing events per year. Groups requesting this type of arrangement should inquire with the Department at least one month in advance.

9 Inspections and Maintenance

The ERSNA granite domes and outcroppings are products of the Llano Uplift. About one billion years ago molten magma solidified miles beneath the earth's surface. Since that time, layers of gneiss, schist, limestone, and sandstone have eroded away, leaving exposed granite. Erosion continues as the granite erodes due to moisture and freeze-thaw cycles. Occasionally, large pieces of granite break loose and change the landscape. Sometimes, rocks become loose but stay in place with the potential to come down.

Fixed protection placements also are subject to deterioration over time due to rock erosion, corrosion of metal parts, damage due to use, and other causes. It is imperative to regularly inspect fixed protection for such damage, and to assess possible needs for maintenance or replacement. The climbing community as a whole is an invaluable resource in this regard, since climbers are acutely aware of the condition of the hardware they depend on, and will promptly report any potential problems.

9.1 Hazardous Conditions Inspection

CTCC has been tasked with identifying and inspecting such potential hazards and reporting to the Park Superintendent. CTCC will maintain a list of potential hazards and submit a Hazardous Conditions Inspection Report twice per year, by October 1 and March 1. These dates were chosen to be just before the annual Granite Gripper climbing competition and just before spring break. The semi-annual report will include the following for each site inspected: location, photo, and recommendations (e.g. continue to

monitor, with Department approval either remove hazards or install anchors to stabilize loose rock, etc.).

9.2 Maintenance of Fixed Protection

CTCC may take the following actions without written application according to the MOU; however, these actions will require prior written notification and authorization from the Superintendent of the Natural Area:

- ◆ Removal of unsafe or unauthorized fixed protection
- ◆ Replacement of unsafe fixed protection

CTCC may take the following actions without written application; however, these actions will require prior notification and review, followed by written authorization from the Superintendent of the Natural Area (subject to review by TPWD process):

- ◆ Placement of fixed protection for rappel or belay stations
- ◆ Reinforcement or relocation of loose and/or unstable rock or other natural material that may endanger climbers or bystanders.

Contacts (interested parties/organizations)

- Enchanted Rock State Natural Area – enchantedrockclimbers@tpwd.texas.gov
- CTCC – centraltexasclimbingcommittee.com

10 Capacity Issues

ERSNA is a very popular park in the Hill Country. Visitation has been increasing at approximately 8-10% a year for the last several years. TPWD recognizes the impact that increased visitation has on its resources, whether natural, cultural or human. As such, TPWD wants to ensure a quality experience for all visitors, climbers and non-climbers. TPWD is developing a carrying capacity for all parks with its system. In the future, visitation may be limited to conserve the resources in this park. TPWD will inform the CTCC of any changes to visitation at the appropriate time.

11 Appendices

11.1 Appendix A: Glossary of Terms

Belay – (n) The use of safety equipment (ropes, anchors, etc.) to protect a climber from falling, usually accomplished by another person holding the rope to which the climber is attached and using a friction device to stop a fall. (v) The performance of a belay.

Belayer – A person performing a belay.

Belay anchor – Fixed protection, usually placed in pairs, intended to be used primarily for belay purposes, i.e. to attach climbers and equipment involved in protecting other climbers while they climb. Such an anchor also often also serves as a *rappel anchor*.

Bylaws (of CTCC) – A document which describes the makeup and activities of the *Central Texas Climbing Committee*. Subordinate to the *Charter of the Central Texas Climbing Committee*. Central Texas Climbing Committee – An elected body which maintains and operates under these Bylaws; an advisory body to TPWD regarding climbing-related issues.

Charter of the Central Texas Climbing Committee – A document which governs the existence of the CTCC and their Bylaws.

Climbing – In precise terms, ascent of the rock. Generally used herein to encompass any activity that involves ascending or descending the rock by any means.

Climbing equipment – Any item not occurring naturally which is used in the process of ascending or descending the rock; for example: bolts, pitons, slings, carabiners, and ropes.

CTCC – Central Texas Climbing Committee.

CTCC Charter – See Charter of the Central Texas Climbing Committee.

Enchanted Rock State Natural Area – A TPWD facility located southwest of Llano, Texas. Also commonly referred to herein as the “Natural Area.”

ERSNA – Enchanted Rock State Natural Area.

ERSNA superintendent – Department official who manages operations at the Natural Area.

Natural Area user – Any visitor to the Natural Area.

Election year – A year in which a CTCC election is held.

Fixed protection – Any item of climbing equipment which remains in place, or which in any way permanently alters natural formations by its presence or placement.

Rappel – Descending on an anchored rope, using friction to control the rate of descent.

Rappel anchor – Fixed protection, usually placed in pairs, intended to be used primarily for rappelling purposes, i.e. to attach equipment involved in supporting ropes used to descend. Such an anchor often also serves as a *belay anchor*.

Removal (of fixed protection) – Removal from the rock of fixed protection, usually followed by application of adhesive.

Replacement (of fixed protection) – Removal of fixed protection, followed by placement of new fixed protection in nearly the same location.

Retro - Addition of new fixed protection to an existing climbing route.

Texas Parks and Wildlife Department – A branch of the Texas state government which manages the acquisition, development and operation of Texas state parks and natural areas. Also commonly referred to herein as the “Department.”

Top anchor – Fixed protection at the top of a climb, usually placed in pairs, intended to be used primarily as a *belay anchor* and/or *rappel anchor*.

TPWD – Texas Parks and Wildlife Department.

11.2 Appendix B: Fixed Protection Application Form

Application for Placement of Fixed Protection at Enchanted Rock State Natural Area

An application for the addition of fixed protection (FP) to a new route may be submitted freely. An application for the addition, removal, or other modification of FP to an existing route (a “retro”) may be submitted so long as that route is not designated a Historic Route.

Most climbing areas at Enchanted Rock State Natural Area (ERSNA) offer clean climbing opportunities protectable by removable slings, artificial chocks and camming devices. Clean climbing, having no permanent impact on the area’s natural resources, is encouraged and is generally unrestricted. The placement of any form of FP for climbing is controlled by the Texas Parks & Wildlife Department (TPWD) through an application and approval process. Any placement of FP requires that the individual installing the FP have in their possession a TPWD approved application bearing their name.

Each application will be evaluated by the Central Texas Climbing Committee (CTCC) on a case-by-case basis, taking into account any specific resource impacts and other non-climbing concerns as well as the qualities of the application from a climbing perspective. CTCC approval of an application requires an affirmative vote from at least three (3) of the five (5) CTCC members. The CTCC may in some cases suggest modifications to an application to improve its viability, and may allow the applicant(s) to make such changes before a decision is made. Approved applications are valid for one year from the date of approval by TPWD. Placement of all approved bolts will be deemed completion of the application. If the specified approval period expires without the approved hardware being installed or if some but not all of the hardware has been installed, then a new application is required to complete the installation.

It is not practical to detail here the full extent of the processes involving application for FP. For further details on the placement of FP at ERSNA, please refer to Sections 7.2 thru 7.3 of the ERSNA Climbing Management Plan (CMP).

Applications are accepted in person by serving CTCC members (www.centraltexasclimbingcommittee.com), via email sent to the CTCC (centraltexascc@gmail.com), or at the following address:

Superintendent

Enchanted Rock State Natural Area

16710 Ranch Rd 965

Fredericksburg TX 78624

Application Rules

1. All application information must be completed or the application is subject to rejection.
2. Applications must be signed by all applicants. Only application signees will be eligible to install the applied for bolts and hardware.
3. Application must unambiguously identify the submitted route. Applications for routes or protection that cannot be precisely located will be rejected.
4. All FP must be a type approved by the CTCC: Standards are Powers 1/2" x 2 3/4" stainless steel 5 piece bolts or equivalent and stainless steel powder coated hangers to match rock color.
5. Application must be for one (1) route only. Variations of a route are each considered as their own route for this purpose.
6. An individual may only have two pending applications active at any given time.
7. Applications may be withdrawn in writing by the applicant at any time.

Applicant Information: Please print

Name:
Street Address:
City/State/Zip
Phone:
Email:

Route Information

Please include with this application topo(s), photos or other documentation to unambiguously identify the route and proposed fixed protection (FP) modifications.

- Indicate whether the FP in question is for ☐ addition to a new route, or ☐ addition to or ☐ removal from an existing route.
- If this is a new route, please indicate whether you have personally ☐ climbed the route in completion, ☐ climbed all the moves though not consecutively, ☐ climbed most but not all of the moves.
- If this is a retro, please indicate whether you have ☐ successfully top-roped only or ☐ successfully led the route.

Route Name:
Grade:
Dome/Area:
Specific Location:
Nearest Route:

Fixed Protection Details

For the addition of fixed protection, detail all types, sizes, color and adhesive for all fixed protection. For removal of existing fixed protection, detail the adhesive to be used. In both cases, be specific.

Please explain your experience locating and placing and/or removing FP for rock climbs. Also, provide information about the tools you plan to use.

Please explain why you feel this route should be modified in the manner applied for.

Signature

Date

11.3 Appendix C: Retro Application Public Feedback Form

Public Input Form (PIF) Regarding Applications for Retros to Existing Routes at Enchanted Rock State Natural Area

An application for a “retro” (the addition, removal, or other modification of fixed protection of an existing route, other than routine maintenance) may be submitted for a route that is not designated as a historic route. Generally the first ascent party retains veto rights over any such modifications to an existing route that has been legitimately established. In the absence of available contact with the first ascent party, applications for retro will be posted and public input solicited and collected for review for a period of three (3) months prior to a vote being recorded by the Central Texas Climbing Committee (CTCC).

The CTCC will review all public comments received, and will take them closely into account in forming its decision. The CTCC will vote on the application and forward its decision to the Texas Parks & Wildlife Department (TPWD) as soon as possible after the end of the public review period. A retro approval requires a unanimous affirmative vote of the CTCC membership and subsequent approval from the TPWD.

For further details on retroing, please refer to Section 7.3.3 of the ERSNA Climbing Management Plan (CMP).

Public Input Forms are accepted in person by serving CTCC members (www.centraltexasclimbingcommittee.com), via email sent to the CTCC (centraltexascc@gmail.com), or at the following address:

Superintendent

Enchanted Rock State Natural Area

16710 Ranch Rd 965

Fredericksburg TX 78624

Public Input Form Requirements

1. All form information must be completed.
2. PIF must be signed by the citizen.
3. Only visitors to ERSNA who have signed a TPWD Climbing Release Form may submit a PIF.

Name:
Street Address:
City/State/Zip
Phone:
Email:

Details & Input

An application for retro was submitted to the CTCC for the route _____ (Name) by _____ (Your Name) on _____ (Date). This route has been applied for retro _____ (#) times. A copy of the application as well as collected historical information regarding the route will be provided upon request made to any serving CTCC member.

Please indicate whether you have ☐ Top Roped and/or ☐ Led the route.

Please indicate whether you ☐ Approve or ☐ Disapprove of the submitted application for retro.

Add any personal comments here.

Signature

Date

11.4 Appendix D: Fixed Protection Application Evaluation Form

Evaluation of Application for Placement of Fixed Protection at Enchanted Rock State Natural Area

For details on Fixed Protection policy & procedures, refer to Sections 7.2 through 7.3 of the ERSNA Climbing Management Plan.

Applicant Name(s):	
Name of Route:	
Application Received By:	Date:

Basic Qualifications of Application

CRITERION	Yes	No	
Signed by all applicants	<input type="checkbox"/>	<input type="checkbox"/>	
All information supplied	<input type="checkbox"/>	<input type="checkbox"/>	
Location clearly specified	<input type="checkbox"/>	<input type="checkbox"/>	
Type of hardware approved	<input type="checkbox"/>	<input type="checkbox"/>	
CTCC Evaluation: Member Name	Yes	No	Abstain
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TOTAL	_____		

CTCC Comments

Results of CTCC Evaluation: ☐ Approved ☐ Disapproved

CTCC Representative Signature

Date

TPWD Evaluation

Complies	Yes	No	Signed
1. Antiquities Act	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Endangered Species Act	<input type="checkbox"/>	<input type="checkbox"/>	_____

TPWD Comments

Final Decision by TPWD: ☐ Approved ☐ Disapproved

TPWD Authorized Representative

Date

11.5 Appendix E: Historic Route Application Form

Application for Historic Route Designation at Enchanted Rock State Natural Area

Routes at Enchanted Rock may be given Historic Route Designation (HRD) in order to protect them from future addition of new fixed protection or other possible modification that would detract from their historic character. All applications will be posted and public input solicited and collected for review for a period of three (3) months prior to a vote being recorded by the Central Texas Climbing Committee (CTCC). The CTCC will review all public comments received, and will take them closely into account in forming its decision. The CTCC will vote on the application and forward its decision to the Texas Parks & Wildlife Department (TPWD) as soon as possible after the end of the public review period. A historic route designation approval requires a unanimous vote of the CTCC membership and subsequent approval from the TPWD. The final decision will be conveyed to the applicant, and will be posted for public viewing for a minimum of at least one (1) month.

For further details on HRD, please refer to Section 7.3.5 of the ERSNA Climbing Management Plan.

Applications are accepted in person by serving CTCC members (www.centraltexasclimbingcommittee.com), via email sent to the CTCC (centraltexascc@gmail.com), or at the following address:

Superintendent

Enchanted Rock State Natural Area

16710 Ranch Rd 965

Fredericksburg TX 78624

Application Rules

1. All application information must be completed or the application is subject to rejection.
2. Application must be signed by the applicant.
3. Application must be for one (1) route only.
4. Application must unambiguously identify the submitted route.
5. Application may be withdrawn in writing by the applicant at any time.
6. If an application for HRD is declined, the route may not be resubmitted for HRD for a period of one (1) year after the final application decision is communicated to the public.

Applicant Information:

Name:
Street Address:
City/State/Zip
Phone:
Email:

General Route Information

Please include with this application topo(s), photos or other documentation to unambiguously identify the route and, if applicable, its existing fixed protection.

Route Name:
Grade:
Dome/Area
Specific Location:
Nearest Route:

Route Establishment Information

Please detail as much pertinent information about the establishment of the route as possible. Particularly important information includes first ascent party name(s), date, style and technique, etc.

It is understood that specifics to some of these details were not documented and may not be possible to ascertain with precision. Please be as thorough as possible. Note: Exact dates may not be known. An acceptable alternative would be the month or season and year.

First Ascension(ist) Party:
Date:
History & manner of Route Establishment (i.e. style, tooling, techniques, etc.):
Any other pertinent information:
Please indicate whether you have <input type="checkbox"/> Top Roped <input type="checkbox"/> or Led the Route
Please detail any other personal history with this route:

Signature

Date

11.6 Appendix F: Historic Route Application Feedback Form

Public Input Form (PIF) Regarding Applications for Historic Route Designation at Enchanted Rock State Natural Area

Routes at Enchanted Rock may be given Historic Route Designation (HRD) in order to protect them from future addition of new fixed protection or other possible modification that would detract from their historic character. All applications will be posted and public input solicited and collected for review for a period of three (3) months prior to a vote being recorded by the Central Texas Climbing Committee (CTCC). The CTCC will review all public comments received, and will take them closely into account in forming its decision. The CTCC will vote on the application and forward its decision to the Texas Parks & Wildlife Department (TPWD) as soon as possible after the end of the public review period. A historic route designation approval requires a unanimous vote of the CTCC membership and subsequent approval from the TPWD. The final decision will be conveyed to the applicant, and will be posted for public viewing for a minimum of at least one (1) month.

For further details on HRD, please refer to Section 7.3.5 of the ERSNA Climbing Management Plan.

Public Input Forms are accepted in person by serving CTCC members (www.centraltexasclimbingcommittee.com), via email sent to the CTCC (centraltexascc@gmail.com), or at the following address:

Superintendent

Enchanted Rock State Natural Area

16710 Ranch Rd 965

Fredericksburg TX 78624

Public Input Form Requirements

1. All form information must be completed.
2. PIF must be signed by the citizen.
3. Only visitors to ERSNA who have signed a TPWD Climbing Release Form may submit a PIF.

Applicant Information:

Name:
Age (only if 17 years old or younger):
Street Address:
City/State/Zip
Phone:
Email:

Details and Input

An application for Historic Route Designation was submitted to the CTCC for the route _____ by _____ on _____ (date). This route has been applied for HRD ____ times. A copy of the application as well as collected historical information regarding the route will be provided upon request made to any serving CTCC member.

Please indicate whether you have ☐ Top Roped and/or ☐ Led the route.

Please indicate whether you ☐ Approve or ☐ Disapprove of the submitted application for Historic Route Designation.

Add comments here:

Signature

Date

11.7 Appendix G: Historic Route Application Evaluation Form

Evaluation of Application for Historic Route Designation at Enchanted Rock State Natural Area

For details on Historic Route Designation policy and procedures, refer to Section 7.3.5 of the ERSNA Climbing Management Plan.

Basic Information

Applicant's Name:	
Application Received By:	Date:
Via:	
Name of Route Applied For:	

Verification of Basic Application Requirements	Yes	No
All required information provided	<input type="checkbox"/>	<input type="checkbox"/>
Route clearly identified	<input type="checkbox"/>	<input type="checkbox"/>
Applicant's signature present	<input type="checkbox"/>	<input type="checkbox"/>

Public Input

The CTCC will review all public comments received, and will take them closely into account in forming its decision.

Public input was solicited and collected beginning on _____ (Date) and ending on _____ (Date)

Provide details on how the public input was solicited.

Was a scheduled public forum held? ☐ Yes, on _____ (Date) ☐ No

The CTCC received _____ (#) Public Input Forms from _____ (#) individuals. There are _____ (#) unique votes in favor and _____ (#) unique votes against the application for Historic Route Designation. This computes to _____ % in favor and _____ % against.

Committee Evaluation

A historic route designation approval requires a unanimous vote of the CTCC membership and subsequent approval from TPWD. The final decision will be conveyed to the applicant, and will be posted for public viewing for a minimum of a least one (1) month.

Below is the record of committee votes. Please see Committee/Member comments below.

Committee Member Name	Yes	No	Abstain
Total			

Results of the Vote: ☐ Approved ☐ Disapproved

CTCC Authorized Signature _____

Date _____

Comments

Final TPWD Evaluation

Texas Parks and Wildlife Department recommends the following on the Committee's evaluation:

☐ Approved ☐ Disapproved

TPWD Authorized Representative

Date

11.8 Appendix H: New Zone Designation Public Feedback Form

Public Input Form (PIF) Regarding New Zone Designation at Enchanted Rock State Natural Area

Specific areas at Enchanted Rock may be given a new Zone Designation (ZD) in order to protect a particular natural or cultural resource that was previously unknown. All pending new Zone Designations will be posted and public input solicited and collected for review for a period of (3) months, as early is as practical, and if possible prior to the implementation of the new Zone. The CTCC and the TPWD will review all public comments received, and will take them closely into account in forming its decision regarding the Zone designation.

For further details on ZD, please refer to Section 7.5 of the ERSNA Climbing Management Plan.

Public Input Forms are accepted in person by serving CTCC members (www.centraltexasclimbingcommittee.com), via email sent to the CTCC (centraltexascc@gmail.com), or at the following address:

Superintendent

Enchanted Rock State Natural Area

16710 Ranch Rd 965

Fredericksburg TX 78624

Public Input Form Requirements

4. All form information must be completed.
5. PIF must be signed by the citizen.
6. Only visitors to ERSNA who have signed a TPWD Climbing Release Form may submit a PIF.

Applicant Information:

Name:
Age (only if 17 years old or younger):
Street Address:
City/State/Zip
Phone:
Email:

Details and Input

A new Zone Designation was forwarded to the CTCC by the TPWD on _____ (date). This Zone is located as follows, and restricts activities as described below. A copy of the Zone description will be provided upon request made to any serving CTCC member.

Please indicate whether you ☐ Approve or ☐ Disapprove of the proposed Zone Designation.

Location and Boundaries of Zone:

[illegible]

Zone Rationale and Restrictions:

Add comments here:

Signature

Date

11.9 Appendix I: Comments on Draft CMP

On August 5, 2016, TPWD posted the proposed Climbing Management Plan on the Enchanted Rock's website. Comments were accepted via email at enchantedrockclimbers@tpwd.texas.gov for a period of two months ending on November 5, 2016. Additionally, two meetings were held by the Central Texas Climbing Committee that allowed individuals to review and comment on the plan. The meeting dates were August 22nd and 29th at [Crux Climbing Center](#).

Below are the comments submitted to the aforementioned email address. The names or email addresses of the originators are not provided.

1. I suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. I suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status.

I support continued access to rock climbing at Enchanted Rock State Natural Area.

I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

I support the Central Texas Climbing Committee it is important to have a representative advisory board for climbers at Enchanted Rock.
2. I was excited to see in my recent Access Fund bulletin that Enchanted Rock has come up for deliberation in regards to creating a new Climbing Management Plan. There are several points that I feel very strongly about that I would like to voice.

First, a quick introduction. I have been climbing for about a decade. I have climbed mostly in New England, but I have also done significant climbs in Canada, Thailand, Argentina, Brazil, Antarctica and the American West. I moved to Houston about 4 years ago for work and have visited Enchanted Rock more than a dozen times. I may be an experienced climber, but I am by no means a good climber,

I am glad to see that the CTCC engages with park management to maintain an open dialogue. I am fully supportive of this arrangement and the CTCC's proposed permitting process for installing new bolts, anchors and routes. I am particularly interested in the idea of installing additional bolts in established routes to enhance safety. These routes were initially installed by hard core climbers who had a much lower degree of safety than most current climbers. In a review of the guide book, there are many routes that have an "R" or "X" rating because there are so few bolts. This may have been acceptable 30 years ago, but now it poses more of a risk. With surge in popularity of climbing gyms and climbing in general, combined with the relative scarcity of developed

climbing locations in Texas, Enchanted Rock gets quite a few new climbers coming to expand their skill set.

Two things happen: 1. These new climbers choose to go to one of the "easier" locations to set up on top-rope, or lead. Or 2. They commit to doing these hazardous routes and unwittingly put themselves in to danger. By adding additional bolts to many of the routes, the climbing crowds may be more distributed and not concentrated into several areas.

Further to the point. I have climbed several routes at Enchanted Rock where I would have appreciated more additional bolts. I have done several climbs that seem like they would be great climbs to develop skills of new climbers, but they are so run-out (distantly spaced) I can't in good conscience advise a new climber to try them. If and when the bolting moratorium is lifted, I intend to submit several applications to where I think bolts should be placed, that improves the safety without diminishing the aesthetics of the rock to either climbers or non-climbers.

With a new era of climbing, the current bolt installations need to be revisited. Today's climbers are less daring and more safety conscious than the previous era of climbers. Also with more climbers, in order to discourage dense pockets of climbers, it may be beneficial to develop additional routes/areas in order to disperse the crowds.

I would also like to bring in to question the guided groups. I realize this is their livelihood, but they should have some respect for other climbers. Setting up ropes on 20 routes and then just leaving them hanging all day is just not good etiquette. Usually these are guides taking out large boy scout troops. I may have missed it in the management plan, but there should be a limit of group sizes, for instance under 15 people, including guides.

I am quite excited about the prospect of a new plan, and I look forward to seeing the results. I also look forward to submitting several applications to install additional bolts to make some of the routes safer for everyone.

3. I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

I like the idea of the application system for new routes. They would not only prevent overcrowding on existing routes, but hopefully also establish new sport bolting standards within the park. Some of the current sport routes feel rather unsafe because of the large distance between bolts, and it would be very much appreciated if a few bolts could be added for safety reasons.

I agree with the proposed bolt-free and top-rope-only zones.

4. I support continued access to rock climbing at Enchanted Rock State Natural Area.

5. First of all, thank you for taking care of Enchanted Rock all of these years. It is a beautiful place that has much to offer for any who love the outdoors.
I appreciate your willingness to review a new management plan for the park. I fully support continued access to rock climbing at Enchanted Rock State Natural Area and am glad TPWD feels similarly.
To ensure the impact of climbing stays minimal, I suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. I suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status.
I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks. Thank you for keeping us in mind!
I support the Central Texas Climbing Committee. It is important to have a representative advisory board for climbers at Enchanted Rock.
I feel the proposed fixed anchor installation process and the new route permits and procedures are a good step forward to ensuring bolting is regulated and does not get out of control.
I fully support "Bolt Free Zones" and "Top Anchor Only Zones" such as those at Fear of Flying, Triple Cracks, Carnivore Boulders, and Split Rocks. Bolts in this area are unnecessary, as the routes can be protected with removable, traditional protection. Condensing top-rope anchors to a certain spot will ensure routes do not become crowded and Enchanted Rock maintains its legacy as a spot Texas climbers come to learn and practice traditional climbing methods. Sport climbing methods (bolted routes) should only be allowed where traditional protection cannot be used, or where the climb is difficult enough to warrant them (harder than 5.12).
As far as commercial activities are concerned, I feel this should be highly regulated. Commercial activities are fine, but large groups could crowd areas that recreational climbers wish to use.
Thank you for listening and again, thanks for protecting Enchanted Rock!
6. As a lifelong Texan, a climber, and an outdoors advocate, I appreciate the time and effort that has been undertaken to develop a comprehensive climbing management plan for ERock. I support continued access to rock climbing at Enchanted Rock State Natural Area. I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.
My earliest memories are hiking up ERock and I think it is important to balance the protection of this natural resource, while also ensuring that park visitors have the opportunity to enjoy a variety of recreation activities, including climbing.
After reviewing the plan, I have the following comments:

1. I suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. I suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status. Setting clear standards avoids arbitrary decisions and avoids confusion. Additionally, adding a review period/public comment period before closing an area, with emergency exception only, again, could avoid the inevitable problems that people may have with closing access.
2. I support the Central Texas Climbing Committee and continuing to involve them in these discussions. It is important to have a representative advisory board for climbers at Enchanted Rock.
3. I support the route development standards developed in partnership with the CTCC.
4. I would request that commercial and non-commercial group use regulations be more specific as to what is being regulated and what the purposes of doing so are.

Thank you again for your time and attention to this.

7. I support climbing access to Enchanted Rock. I feel that the climbing community should have an opportunity to weigh in on possible zone closures. Enchanted Rock is a real jewel in that it is one of the only places in Central Texas to do trad climbing. The climbing community have been and continue to be champions for protection of these natural areas and are always some of the first to volunteer for trail improvement projects, etc. Please continue to work with the climbing community so we can all enjoy this natural treasure for generations to come.
8. I support continued access to rock climbing at Enchanted Rock State Natural Area. I feel that all areas currently open to climbing remain open to climbing. I discourage the prohibition of natural protection/ top rope only zones.
9. Getting more Texans outdoors is a huge win. Climbing not only draws climbers but inspires non climbers to engage their parks in new ways. I think re-vamping the maintenance and new route methods at erock is a win win.
10. I'm so happy to see that E-rock will be reopen for new route development! We can travel less to enjoy more beautiful climbs! Thanks!
11. I support continued access to rock climbing at Enchanted Rock State Natural Area. I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks. Some routes should contain fixed protection and anchors (ie ripple, pro sweat...etc). Some routes need anchors only (ie little feat, sweat..etc) Some routes do not need protection or bolts (ie cave crack, fear of flying....etc) I ask that

discretion be given to placing bolts.

12. I am writing in support of the proposed climbing management plan by the CTCC for the Enchanted Rock State Natural Area. I have climbed out at E-Rock with many friends for almost 20 years and have enjoyed the park as a much needed escape from the city life of Austin. Over the years, we have come to appreciate the cooperation between the parks department and the climbing community and this climbing management plan is another good example of our mutual respect and willingness to work together. Not all parks are as open to the idea of rock climbing on their property, so we appreciate the Enchanted Rock park management hearing our voice through the CTCC.

I have read over the proposed plan and I agree with the ideas of bolt-free zones and top-rope only areas. But I am also glad to see that some new route development will be considered and that there is a well thought out procedure for review and approval. I am also glad to see that regulation is included for both commercial and non-commercial groups.

Thanks again for considering this plan and seeking public feedback.

13. I support the draft climbing management plan. Thank you for your work on this issue. I plan to continue climbing at Enchanted Rock with full respect to the beautiful natural environment, and I hope that my kids can do the same in the future. I feel that ending the moratorium on new bolts at Enchanted Rock will make climbing safer for everyone.

14. I suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. I suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status.

I support continued access to rock climbing at Enchanted Rock State Natural Area. I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

15. I would love more climbing options at Enchanted Rock! I have not been able to climb there yet because I do not have the equipment for trad climbing, but opening up more opportunities for sport climbing would increase the amount of people that would be willing to climb there. Replacing existing bolts would help keep climbers safe, which is a win for everyone involved.

16. Enchanted Rock is my first experience outdoor climbing, and started my addiction to outdoor climbing! I would love to have more development of Enchanted Rock as long as it maintains the integrity and beauty of the location in a way that is friendly to climbers, hikers, and adventure seekers of all kinds!

17. Among outdoor enthusiasts, climbers are some of the most dedicated to preserving natural environments and working towards keeping areas such as Enchanted Rock pristine. The additional influx of climbers to ER would increase the daily revenue and would help sustain the efforts by the TP&W. As a PhD student at Texas A&M University, groups of students from A&M regularly travel to the greater Austin area on weekends to go climbing. Opening ER would help distribute climbers so that there was less concentration on areas such as Reimer's Ranch. I hope an amicable agreement is developed between the Access Fund and TP&W.

18. The Access Fund welcomes this opportunity to comment on Enchanted Rock State Natural Area DRAFT Climbing Management Plan. Enchanted Rock offers a unique opportunity for rock climbing in Texas. Rock climbing at Enchanted Rock dates back to the 1930's and continues to draw large numbers of climbers today. Access Fund appreciates the long-standing working relationship between the Central Texas Climbers Coalition (CTCC) and Texas State Park. This climbing management plan could influence future climbing management throughout the state of Texas, Access Fund offers these comments with the intention of supporting a sustainable climbing management plan (CMP) for Enchanted Rock State Natural Area (SNA).

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 and accredited land trust supporting and representing millions of 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 over 13,000 members and 100 affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

Purpose

The purpose and need for the DRAFT CMP is well defined: to protect natural and cultural resources, and provide a '*sustainable platform for the management of rock climbing activities at Enchanted Rock*'.¹ We recommend that the valuable and historic climbing resources, in addition to the cultural and natural resources, be specifically listed as a value to protect and manage at Enchanted Rock. The high-quality climbing experience Enchanted Rock offers is a valuable resource worthy of protection. In addition, high levels of climber visitation generate revenue for the Park and provide economic benefits to the surrounding community. We suggest further research be conducted and citations be provided for the numerous statements made throughout the document referring to visitor use patterns² and impacts to resources³ at Enchanted Rock SNA.

Closures and restrictions

The DRAFT CMP gives an excellent history of Enchanted Rock SNA. To further clarify the proposed *top-rope* and *bolt free zones* we suggest listing all areas in an appendix, instead of the CMP body, which can easily be updated if zones change. In addition, we suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. We suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status.

Permits

The permit process to place fixed anchors is well thought out but somewhat complicated to follow. We suggest making permit applications, and first ascent registration available online to ease the documentation and application process. We also suggest compiling a simple handbook or kiosk display with photos and descriptions of natural and cultural resources a climber could encounter and should avoid. This educational material could be beneficial for all climbers as well as developers.

Hardware Standards

We recommend fixed anchors be clearly defined, ‘Fixed anchors, defined by the Access Fund and other Federal land managers, as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber’s safety system.’⁴ We suggest specific hardware standards be outlined either in the CMP or a subsequent fixed hardware handbook. Further clarification and a definition for ‘soft hardware’⁵ should be included in the CMP. It is important to require fixed anchors adhere to current best available technology and practices to ensure quality and safety. For more information on bolting best practices and suggested hardware visit the Access Fund’s Fixed Anchor Resource Center at: <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors>.

Non-Commercial and Commercial Group Use

We suggest clear guidelines be developed to manage large groups at Enchanted Rock. Guided groups can be an excellent introduction to rock climbing but should be managed in a way that protects resources, resolves user conflict and allows for appropriate group use.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help the Texas State Parks improve trails and staging areas around climbs as well as other management needs. Local climbing communities like the CTCC have a long history of positive environmental stewardship and collaboration with other organizations to protect this wonderful, highly-valued resource. Access Fund strives to work with local climbers and land managers to address management needs, we provide training on planning and stewardship best practices to keep climbing areas healthy. In addition, some aspects of this planning initiative may

qualify for the Access Fund Climbing Preservation Grant Program⁶ or assistance from our Conservation Team⁷ which helps maintain climbing areas throughout the United States.

Thank you for your consideration of these comments on the Enchanted Rock DRAFT Climbing Management Plan. The Access Fund has the experience, local contacts, and resources to help planners craft plans that encourage climbing while sustaining the health and integrity of the State Parks and Natural Areas. The Access Fund looks forward to participating throughout the planning process. Please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the staff to seek input from diverse groups and interests in response to the proposed climbing management plan. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

¹ Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 1.

² Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 6,8,10.

³ Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 11.

⁴ https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf

⁵ Enchanted Rock State Natural Area Rock Climbing Management Plan, Draft-2016. Page 12.

⁶ See: <https://www.accessfund.org/take-action/apply-for-a-grant>

⁷ See: <https://www.accessfund.org/meet-the-access-fund/our-approach/local-support-mobilization>

19. I am an avid climber and have been climbing since 2008. I believe that suspending the bolting moratorium would greatly increase the safety measures and interest for climbing at Enchanted Rock. Bolt Free Zones and Top Anchor Only Zones would greatly preserve areas that need it, which is important as well. I am very excited about the potential for new and more bolted routes at E Rock! I have historically not visited E Rock due to the lack of bolted routes. If there were more bolted routes I know that I and other climbers would be much more interested in visiting E Rock.

20. I agree with the Draft Climbing Management Plan.

21. I support continued access to rock climbing at Enchanted Rock State Natural Area.

I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

I support the Central Texas Climbing Committee it is important to have a representative advisory board for climbers at Enchanted Rock.

22. General Comments - I commend the CTCC committee and ERSNA staff on working to sustain the activity and history of climbing at Erock. With so much public land under threat, it's good to see Texas Parks working to maintain recreational access to what little public land we have in the state. As a unique user group within the park, I recognize that climbers can stand out in terms of our location and use of the resource. That said, I think it's important to look at our impact realistically when compared to the significantly larger user groups of casual visitors that inundate the park each weekend. While climbers can have an impact with things such as fixed protection and trail use, I personally believe from many days of visitation that our impact pales in comparison to the massive and often ignorant foot traffic Erock sees from "hikers" wandering all over the park. Historically, climbers have come from backgrounds that were very much seemed in the Leave-No-Trace ethic. The park encouraging climbers to reach out to the masses as stewards would likely benefit the park and perhaps even help to reduce impact overall.

23. Specifically on the MOU-

5.5 - Visual Impact of Fixed Protection

Reducing visual impact is a noteworthy concern and should be attempted as much as possible. While painting reflective surfaces can be an extremely effective method, one should also consider paintings downsides and if alternative methods better achieve the overall goal of safe anchors with low visibility. Painted or "Powder Coated" flat-metal hangers can have corrosion issues over time, even with SS. With both surface coatings, it eventually chips and those cracks in the surface coating allow moisture to become trapped accelerating corrosion. While Erock is generally a "dry" environment, there are certainly wet seasons or runoff streaks where this could be an issue. I suggest CTCC employ multiple options to reduce visible impact depending on the situation. Round Bar Stock bolts such as those found with SS Glue In Bolts (there are also round stock hanger options) reduce visible impact by up to 60% vs normal "flat stock" hangers thus nearly eliminating any need for painting. In certain, highly visible locations, painting may still be necessary to hide the bolts but in these cases, only painting the non-rock-side surfaces would be best. If painting is the option selected, LATEX spray paint should be used. No etching

primers which significantly accelerate corrosion or oil based spray paints which do not adhere as well as latex.

7.3.2.1 Fixed Protection Application Form and Requirements - "Specific type and size of hardware, installation procedure and adhesive (if any) to be used for each proposed fixed protection placement and any coating/painting or camouflage provided."

See 5.5 above regarding painting/coating.

While not an uncommon practice in the mid 80s to early 90s, the practice of sealing mechanical bolt holes with adhesive such as silicone is not an accepted practice today save for very rare and unique situations not found at ERock.

Bolting organizations such as the ASCA recommend against it and fixed anchor experts also avoid the practice. CTCC should NOT be sealing mechanical bolts at Erock. Please note this is different than using an Epoxy Glue In.

7.3.2.4

2/3 CTCC majority should be changed to reflect CTCC member numbers correctly - with 5 members it's not possible to have 2/3 - only 3/5 or 4/5 etc.

7.3.2.5 Application Guidelines 7. Applicant experience There should be a process to have experienced fixed hardware people on an approved list to provide supervision and guidance. CTCC board membership does not have any requirements related to fixed hardware knowledge so their presence does not ensure expertise. It might but, there are others who may in fact be more knowledgeable on fixed hardware vs future CTCC board membership.

7.3.3 Application for Additional Fixed Protection ("retro") or Existing Placement Modification or Removal on an Established Climbing Route I support the idea of extra protection given by historical route designation. However, the unanimous requirement for retro application seems redundant and essentially a slightly "lower bar" to overcome vs the Historic route. Consider 4/5 majority approval of retro/modification request if the historical double protection remains.

9.2 Maintenance of Fixed Protection

- Replacement of unsafe fixed protection How does this pertain to Pins? I'm specifically thinking of "The Wick" and the two pins that, IMO, should be replaced with bolts in like positions at some point.

- Placement of fixed protection for rappel or belay stations CTCC can do this as needed but an individual needs to apply - correct?

More generally speaking, TR Anchors often can help to reduce top-of-cliff traffic, erosion and emending foot traffic and should be considered in areas, even bolt free zones, if the overall impact is reduced. Although slightly more complicated, TR Anchors might also be considered if a considerable hazard exists for a "walk off", even in Bolt Restricted areas (Specifically thinking of SE Face of Buzzards Roost)

The climbing population in Central Texas continues to grow, both from within and through migration of climbers to the region. I support the Park looking for

ways to engage this resource of environmental "enthusiasts" in ways that will improve the park for all such as trail work, litter clean up etc etc.

24. I've been to Enchanted Rock a few times and climbing there for the first time just recently. It's an important part of the local climbing culture and repertoire. I'm excited by the idea that new routes could potentially be added or augmented with bolts there. I think that climbing is a great sport and generally environmentally good.
25. First of all, thank you for taking care of Enchanted Rock all of these years. It is a beautiful place that has much to offer for any who love the outdoors. I appreciate your willingness to review a new management plan for the park. I fully support continued access to rock climbing at Enchanted Rock State Natural Area and am glad TPWD feels similarly. To ensure the impact of climbing stays minimal, I suggest any areas closed to climbing be explicitly listed and figures included showing the various zones and closed areas. I suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status. I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks. Thank you for keeping us in mind! I support the Central Texas Climbing Committee. It is important to have a representative advisory board for climbers at Enchanted Rock. I feel the proposed fixed anchor installation process and the new route permits and procedures are a good step forward to ensuring bolting is regulated and does not get out of control. I fully support "Bolt Free Zones" and "Top Anchor Only Zones" such as those at Fear of Flying, Triple Cracks, Carnivore Boulders, and Split Rocks. Bolts in this area are unnecessary, as the routes can be protected with removable, traditional protection. Condensing top-rope anchors to a certain spot will ensure routes do not become crowded and Enchanted Rock maintains its legacy as a spot Texas climbers come to learn and practice traditional climbing methods. Sport climbing methods (bolted routes) should only be allowed where traditional protection cannot be used, or where the climb is difficult enough to warrant them (harder than 5.12). As far as commercial activities are concerned, I feel this should be highly regulated. Commercial activities are fine, but large groups could crowd areas that recreational climbers wish to use. Thank you for listening and again, thanks for protecting Enchanted Rock!
26. Please allow Access Fund to establish new fixed-anchor routes. Their efforts keep the climbing world safe through well managed, sustainable climbing practices that benefit Texans and Visitors alike.

I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

27. Please continue to keep Enchanted Rock open and safe for climbing! Thank you!

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28. As a climber at enchanted rock, I support this initiative.

I agree that some areas without natural protection should be allowed to be bolted, and Top anchors being placed on traditionally protected routes.

I believe Enchanted rock could benefit from acquiring surrounding land with granitic formations, not only from a climbing perspective, but also from a popularity perspective: Erock is extremely popular, and the number of people is overwhelming at times.

I think the park should also implement leave no trace education- the number of people touching/messing with the pools at the top of main dome is large and angering.

Perhaps fencing around the largest of the pools?

I support continued access to rock climbing at Enchanted Rock State Natural Area.

29. I think these changes will be beneficial to Enchanted Rock because it will open up more climbing for all climbers. Allowing RESPONSIBLE bolting will open up opportunities for trips to enchanted rock when other climbers don't have all the gear for traditional climbing styles. I like the idea of "bolt free zones" and "top anchor only" areas as well. Thank you very much for your consideration!

30. I lived in Austin for 16 years and Enchanted Rock (E-Rock) was the first place I ever climbed. The opportunities E-Rock provides to people of all ages to experience the outdoors in a variety of ways is unique to a few locations in the country. The climbing possibilities it presents makes it an even more unique local and nationwide resource.

I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

I may not live in Texas any longer but I am a lifelong Texan and support both conservation and climbing at E-Rock.

31. I want to start by saying a huge thank you for all that you do! The Texas parks are huge part of the Texas experience, and without your careful diligence in protecting these amazing places we would all be at a great loss.

I am writing this message in an effort to give affirmation towards the development of a sustainable climbing philosophy for the Texas Park system, specifically in this case regarding Enchanted Rock. As the sport of climbing continues to grow (astronomically it seams), the need for outdoor climbing areas is vital. Without properly maintaining existing areas, and planning for expansion or new areas, the climbing destinations simply can't handle the demand.

Enchanted Rock is the perfect place to start as it is one of the only viable traditionally protect-able areas to climb in Texas. This greatly reduces the need for hardware to be installed in the rock. I know off the top of my head several excellent areas that could be equipped, with only two bolts, for the enjoyment of many people. As Climbing is the fastest growing outdoor sport, it only seems right to responsibly open up these spaces to be appreciated in new and exciting ways.

32. I support continued access to rock climbing at Enchanted Rock State Natural Area.

I appreciate the inclusion of the climbing community in this important planning process and any future climbing management plan processes for Texas State Parks.

I support the Central Texas Climbing Committee, and it is important to have a representative advisory board for climbers at Enchanted Rock.

33. Enchanted Rock is a place that has so much natural, cultural and climbing history. It needs some love and I think it is one of the most underrated climbing spots in all of Texas.

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