



Protect America's Climbing

September 26, 2019

ATTN:
Planning Team Leader, Forest Plan Revision
1323 Club Drive
Vallejo, CA 94592

Submitted via email: r5planrevision@fs.fed.us

RE: Comments on Revised Draft Environmental Impact Statement for the Sierra and Sequoia National Forests Land Management Plans

Dear Forest Planning Team:

The Access Fund appreciates this opportunity to provide feedback on the revised Draft Environmental Impact Statement (DEIS) for the Sierra and Sequoia National Forests Land Management Plans. The Sierra and Sequoia National Forests provide some of our country's highest quality, world-class climbing opportunities that range from big-wall backcountry wilderness adventures to easily accessible frontcountry bouldering opportunities. Some of the huge, monolithic granite formations of the Sierra Nevada National Forests are not only revered by rock climbers throughout California, but also worldwide. We appreciate that climbing is acknowledged as one of the many recreational uses of the Forest.¹ These comments are intended to assist planners in the development of appropriate alternatives that enhance and protect climbing access, while maintaining the health of the National Forests.

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 20,000 members and 123 affiliates. We currently hold memorandums of understanding with the Forest Service to help define rules for how climbing will be managed on federal land.² The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. California is one of our larger member states and many of our members regularly travel to climb in the National Forests of the Sierra Nevada mountain range. For more information about the Access Fund, visit www.accessfund.org.

¹ Draft Assessment of Sequoia, Sierra and Inyo National Forests

² See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

COMMENTS

The rock climbing in the Sierra and Sequoia National Forests is some of the most popular and prolific of its kind in the country. Each climbing area within each of the Forests is unique, and site specific considerations should determine the appropriate level of management. The 2012 Planning Rule aims to balance multiple-uses, including recreation, with the restoration and maintenance of forest and water ecosystems. To do so, revised forest plans must include plan components throughout that address and integrate sustainable recreation, including recreation designations, settings, opportunities, access and scenic character.³ While the draft plans include many commendable elements, we identify several crucial omissions below, as well as numerous detailed suggestions for how the Forest Service can more thoroughly integrate elements of sustainable recreation with other plan components.

Sustainable Recreation

As part of managing sustainable recreation, rock climbing should be more clearly identified throughout the plan as an appropriate form of recreation on the Forest. The growth in both general recreation and in climbing means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest. Although climbing is listed at least once in each draft plan, the final plans should specifically mention climbing and other recreational activities whenever there is an opportunity to do so. Along with these comments we have provided a link to an interactive webmap produced by Outdoor Alliance containing data for climbing locations as well many other forms of human powered recreation opportunities on the Sierra and Sequoia National Forests.⁴

We have actively participated in every step of the planning process and submitted a series of comments related to rock climbing management and access in the Forests; however, we have not seen much of our recommendations, geospatial information or comments incorporated in the revised DEIS. The Forest Service does not appear to have evaluated a complete inventory of dispersed climbing areas and associated use-patterns (Access Fund has provided an inventory in previous comments). It is therefore important that the Access Fund inform the Forest Service on climbing resources so that longstanding climbing areas, access roads, and trails are identified and appropriately managed and maintained. All climbing data can be reviewed on the joint recreation map produced by Outdoor Alliance.⁵

Desired Conditions for Sustainable Recreation

While the forest-wide desired conditions related to sustainable recreation for the draft plans set worthy goals, and we understand that long-range plans cannot dive too deeply into tactical prescriptions, objectives are limited with respect to recreation infrastructure management and there is little in these draft plans that specifically describes what steps the Forest Service will take to achieve desired conditions. In order to be effective, Desired Conditions must be supported with other required plan components, including specific objectives, standards and guidelines. Without a full complement of

³ (36 CFR 219.10 (b)(1)(i))

⁴ <https://outdooralliance.maps.arcgis.com/apps/webappviewer/index.html?id=b3ab8a4ef3bf4ba2b12b03a722112a09>

⁵ Ibid.

plan components, including measurable objectives that link plan components to monitoring and adaptive management, the plans do not provide a clear path to achieving the desired conditions.

The Access Fund recommends that the following Desired Conditions be included in the Forest plans:

1. Recreation management must recognize and identify rock climbing throughout the Forest Plans as a legitimate wilderness and non-wilderness activity as well as a legitimate activity inside and outside of the proposed Backcountry Management and Sustainable Recreation Management Zones and the conditional use of fixed climbing anchors as appropriate.
2. Rock climbing destinations are places of special recreational significance and are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support.
3. Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
4. Evaluate existing recreation infrastructure and possible new opportunities for sustainable recreation (trails, trailheads, climbing access, camping sites, etc.) as the Forest Service analyzes and implements forest health and fuels management projects.
5. Prioritize working with local governments and communities, recreation user groups, and other nonprofit or non-governmental entities to fund, develop and maintain sustainable multi-use areas within appropriate Recreation and Backcountry Management Areas outside of designated and recommended Wilderness.

Alternatives

We appreciate the Forest Service's introduction of a Backcountry Management Area (BMA) concept as part of alternative E in the DEIS as a means to protect important roadless areas and other wildlands not recommended for wilderness. We have worked with Outdoor Alliance and Sierra Forest Legacy to improve geospatial datasets on existing non-motorized recreation infrastructure, assets, and opportunities on these forests, and have collaborated with our partners in the broader conservation community to find workable compromise between our shared desire to protect and preserve wilderness characteristics, solitude, natural soundscapes, and the highest levels of scenic and ecological integrity wherever possible on these forests, while still allowing for appropriate non-motorized recreational access and opportunities. We feel that, with more specific definition and management prescription, the balance between recommended wilderness areas and BMAs introduced in alternative E (with collaboratively-drawn boundaries as amended in the most recent datasets provided by Outdoor Alliance), represent a solid and sustainable management scenario for these particular landscapes. There continues to be a need to clarify management prescriptions for different Special Recreation Management Areas as well as Backcountry Management Areas to ensure appropriately focused management for areas of particular recreational significance. Overall alternative E will effectively protect key ecosystems that are currently underrepresented in the National

Wilderness Preservation System, as well as the variety of human-powered recreation opportunities therein, in a way that will minimize stakeholder conflict and add collaborative support for these designations.

Fixed Anchors and Rock Climbing

Rock climbing is considered an appropriate form of recreation and approximately 30% (about 10,000 climbing sites) of America's climbing resources are managed by USFS. Rock climbing presents USFS land managers with a unique set of management considerations as a result of activity-specific use patterns and equipment. The climbing user group continues to rapidly grow, and throughout the US, land managers collaborate with local climbing communities and national organizations (such as the Access Fund) to steward climbing areas in order to maintain sustainable climbing resources for future generations. The Sierra and Sequoia National Forests affords many exceptional and diverse climbing opportunities.

We recommend that the Sierra and Sequoia National Forest Plans include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity, as well as legitimate inside and outside of the Sustainable Recreation Management Zones and Backcountry Management Zones and the conditional use of fixed climbing anchors as appropriate. Fixed anchors, defined by the Access Fund and the USDA Forest Service⁶ 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. Fixed anchors are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor.

The vast majority of climbers have never placed a fixed anchor, opting instead to climb established routes, thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor.⁷ Fixed anchors, specifically bolts, necessitate long-term maintenance.⁸ Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently.⁹ Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts.¹⁰ Motorized drills are specifically prohibited in designated wilderness and often (but not necessarily) prohibited in recommended wilderness areas. Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Sierra

⁶ See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiate

⁷ Studies indicate that the vast minority of climbers (<20% based on site specific samples) have ever placed a bolt. It is reasonable to assume that an even smaller minority of climbers have placed a bolt (hand drilled) in a remote wilderness setting based on documented climber use-patterns.

Schuster, R. M., Thomson, J. G., & Hammitt, W. E. (2001). Rock Climber's Attitudes Toward Management of Climbing and the Use of Bolts. *Environmental Management*, 28(3), 403-412.

Murdock, E.D. (2010). Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California (Unpublished).

⁸See <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

⁹ Ibd.

¹⁰ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

and Sequoia National Forests wilderness inventory under alternative C) depend on long term stewardship in order to maintain the established climbing routes and descents.

Currently it is difficult for us to appropriately assess the proposed wilderness recommendations in the various alternatives given the pending status of Forest Service Manual (FSM) 2320. Without official guidance from pending FSM 2320 we are forced to take a conservative approach in our recommendations due to the fact that we do not know how rock climbing will be considered in wilderness areas under a revised FSM 2320. Furthermore, considering the lack of national-level Forest Service guidance on the use and placement of fixed anchors in wilderness (presumed to be issued through the forthcoming FSM 2320), and the fact that a relatively large amount of climbing occurs in designated wilderness and in recommended wilderness (especially in alternative C), it is important that the Forest Service is aware of the locations and best practices associated with rock climbing. These comments are intended to assist the Forest Service to ensure that climbing access is protected, and appropriate management prescriptions and designations enhance these nationally-significant climbing opportunities.

Climbing is considered an appropriate wilderness activity;¹¹ however, not all types of climbing activities are suitable within designated wilderness areas. In general we support wilderness recommendations where they do not conflict with established climbing areas and/or jeopardize access to climbing destinations. Fixed anchors,¹² although conditionally allowed in most Forest Service, Bureau of Land Management and National Park Service wilderness areas, can be problematic with regard to wilderness management, without proper guidance put in place.¹³

The Sierra and Sequoia Forests should articulate a clear fixed anchor policy to promote climber safety in wilderness and non-wilderness areas. Fixed anchors are unobtrusive, and typically not visible to forest visitors. Fixed anchors should be permitted across all ROS categories (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary. For more information of fixed anchor technology and best practices visit our best practices resource page.¹⁴

Until the Forest Service develops and implements a clear and consistent policy for safe fixed bolt and hardware maintenance in designated wilderness areas, climbing areas that are well developed (such as Needles) should not be recommended as wilderness in order to prevent future management issues associated with fixed anchor maintenance (power drills are not allowed in wilderness). It should be noted that many well developed, existing climbing areas in both the Sierra and Sequoia Forests under

¹¹ National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012 state that climbing is an appropriate wilderness activity. The USDA National Forest Service has yet to issue a national policy on wilderness climbing; however, climbing is allowed in most every national forest with climbing resources. There are approximately 7,000 climbing areas in national forest wilderness (source mountainproject.com).

¹² https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf

¹³ National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012

¹⁴ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors>.

alternative C are “substantially noticeable”¹⁵ and should thereby be excluded from wilderness recommendations in order to prevent undesirable future management issues. The Forest Service Land Management Planning Handbook clearly states that “[a]s a general rule, developed sites should not be included [as wilderness]”.¹⁶

The following climbing areas are well-established and some were developed as early as the mid-1960s. These “developed sites” are “substantially noticeable,” and should not be included in recommended wilderness in order to effectively maintain the exceptional climbing opportunities of today into the future: the entire Needles climbing area, Dome Rock, Kernville Rock, Church Domes and the Rectory, Kern Canyon Dome, Trapper Dome, and the Shuteye Ridge areas including Slasher Dome, 5.7 Dome, Big Sleep, Chiquito Dome, Crocodile Dome, Dreamscape, Eagles Nest, Gray Eagle, High Eagle, Midway Dome, Red Eagle, and Shangri La. Access Fund has provided the USFS with descriptions and GPS coordinates for the aforementioned climbing resources in previous comments as well as the current Outdoor Alliance data sets.

We recommend the following language be included specific to fixed anchor management in wilderness:

RECREATIONAL CLIMBING.—Nothing in this plan prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this plan—

(1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and

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

Access Fund and The Wilderness Society have crafted this guidance language together to assist in future management of fixed anchors in wilderness.

Well managed climbing areas provide forest visitors with exceptional recreation experiences. In order to achieve this goal, national forests; 1) foster partnerships with the local climbing community, 2) develop strategies for human waste management, resource protection and erosion control, and 3) collaborate with local climbing organizations on education and stewardship initiatives.

Climbing Access

The Access Fund maintains that rock climbing is an appropriate activity across the Forests and all ROS categories.¹⁷ Climbing is a relatively low impact activity that can be managed sustainably to the mutual benefit of the public and the Forest. Therefore, access to climbing resources should be maintained and protected. Climbers have well-established record of supporting natural and cultural resource based closures and restrictions. We ask that closures be well-substantiated and lifted when determined

¹⁵ The Wilderness Act states that wilderness “(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable . . .” (16 U.S.C. 1131c).

¹⁶ Forest Service Handbook 1909.12 – Land Management Planning Handbook, Section 71.22b, number 7.

¹⁷ See http://www.fs.fed.us/cdt/carrying_capacity/rosfieldguide/ros_primer_and_field_guide.htm

unnecessary. Clear and timely information (on closures, trail conditions, use patterns etc.) will facilitate positive outdoor recreation experiences and reduce conflict amongst visitors.

The Access Fund offers to partner with the Sierra and Sequoia Forests to work on improving existing access trails and paths to established climbing areas. By allowing the Access Fund¹⁸ and affiliated local climbing organizations to assist the Forest Service in stabilizing main access paths and trails and reclaim braided social trails, climbers can minimize their impact while hiking and improve erosion control. Existing infrastructure should be maintained and potentially expanded in established sport climbing or bouldering areas which see a higher volume of climbers.

The Access Fund encourages improving climbing access for all of the public including gateway communities and underserved populations. By developing partnerships with the Access Fund and other like-minded organizations we can work to deepen connections between the Forest and the broader public. The Access Fund is committed to educating climbers on best practices while climbing and visiting natural landscapes and wilderness, including an education program directed at facilitating environmentally responsible transitions from indoor gym climbing to climbing outdoors – a trend that is driven by the popularity of indoor climbing gyms.¹⁹ We hope that the Forests will continue to manage rock climbing resources in a manner that balances access to recreation and conservation of the climbing environment.

Recommendations for Sequoia National Forest

Sequoia National Forest is fortunate to offer some of the most spectacular climbing opportunities in the country. Hermit Spires was first climbed by Fred Beckey in 1969 and the Needles climbing area (pictured), within Sequoia National Monument, is a destination for domestic and international climbers.



We offer the following comments to further articulate the importance of existing climbing areas in the Sequoia National Forest that should be recognized in the Forest Plan as valuable recreational resources.

The Needles, Domeland Wilderness, Kern Plateau and other well-established climbing areas have fixed anchors that warrant long-term maintenance. The following areas should be recognized as approved climbing areas within the Forest and the use and maintenance of fixed anchors should be allowed where appropriate.

Domeland Wilderness Place (Domelands): A well-established climbing destination with its own climbing guidebook.²⁰ It features long, high quality granite traditional climbs particularly on Bart Dome and

¹⁸ See <https://www.accessfund.org/meet-the-access-fund/our-approach/stewardship-conservation>

¹⁹ <https://www.accessfund.org/learn/the-climbers-pact>

²⁰ Vernon, Greg. 1992. *Southern Sierra Rock Climbing: Domelands*. Globe Pequot Press

Church Dome. Sequoia should recognize Domelands as an established climbing area and develop a common sense fixed anchor policy (described above) for the area.

Kern Plateau Place: Add rock climbing to the intended uses of this area. There is extensive climbing on the plateau’s featured granite domes.

Lower Kern River Place: Add rock climbing to the intended uses of this area. Specifically as a bouldering destination.

The Needles: Add rock climbing to the intended uses of this area. There is extensive traditional climbing featured on the large granite features known as the Needles. The Needles has one of the highest densities of classic (world-renowned) routes anywhere, attracting climbers from around the world. We oppose any wilderness designation that threatens the long established history of sport climbing in the Needles. We request that the Needles be prioritized when considering wildfire mitigation as a “key resource,” particularly considering the 2011 fire in the Needles.

Recommendations for Sierra National Forest

Sierra National Forest is also fortunate to offer exceptional climbing opportunities. Shuteye Ridge (pictured) and Courtright Reservoir include many climbing routes (some established in the early 1980s) on large, high quality granite domes only a couple hours drive from urban areas and gateway communities. These well-established climbing areas have fixed anchors that warrant long-term maintenance efforts. These areas should be recognized as approved climbing areas within the Forest and the use and maintenance of fixed anchors should be allowed where appropriate.



Special Use Permit Authorization

We support the continued issuance of outfitter and guide special use permits for facilitated outdoor recreation activities on the forests. Outfitters and guides help to educate the public on best practices for climbing on public lands including Leave No Trace principles and safety practices. We recommend the authorization of new and existing outfitting and guiding activities when capacity exists and the uses are consistent with desired conditions for the area.

Diversity, Equity, and Inclusion

Access Fund strongly encourages the Forests to consider the needs of marginalized and underrepresented communities as they finalize the Plans. Access to our public lands and outdoor spaces is a right that all Americans should be able to enjoy, regardless of their background. With many prime recreation destinations within day-trip distance of several major, diverse population centers, the

Sierra and Sequoia National Forests have a powerful opportunity to connect communities that have traditionally been less present on our public lands to exceptional recreation resources. Access Fund is willing and able to offer consultation in regards to diversity, equity, and inclusion on the Forests, as well as connect the Forests with additional experts in the field.

Summary of Recommendations

Recreation management must recognize and identify rock climbing throughout the Forest Plans as a legitimate wilderness and non-wilderness activity, as well as a legitimate activity inside and outside of the proposed Backcountry Management and Sustainable Recreation Management Zones. Managers should also recognize the conditional use of fixed climbing anchors as appropriate. The growth in general recreation and climbing means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest. There continues to be a need to evaluate existing recreation infrastructure and possible new opportunities for sustainable recreation (trails, trailheads, climbing access, camping sites, etc.) as the Forest Service analyzes and implements forest health and fuels management projects. The Forest Service should prioritize working with local governments and communities, recreation user groups, and other nonprofit or non-governmental entities to fund, develop and maintain sustainable multi-use areas within appropriate Recreation and Backcountry Management Areas outside of designated and recommended Wilderness.

Most of the existing climbing areas within the forests use fixed anchors (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to climbing community. Climbing resources in the Sierra and Sequoia National Forests provide the public with unique opportunities to experience primitive, human-powered recreation in beautiful settings. The Access Fund maintains that rock climbing is an appropriate activity across the Forests and all ROS categories. Climbing is a relatively low impact activity that can be managed sustainably. The Access Fund offers to partner with the Sierra and Sequoia Forests to work on improving existing access trails and paths to established climbing areas. The Access Fund encourages improving climbing access for all of the public.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the Forest may require to provide for the world class opportunities found in the Sierra and Sequoia National Forests. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program²¹ or assistance from our Conservation Team²² which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

* * *

Thank you for your consideration of these comments on the DEIS. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,



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The Access Fund

Cc: Chris Winter, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director

²¹ See http://www.accessfund.org/site/c.tmL5KhNWLRH/b.5000903/k.9722/Grants_program.htm.

²² See http://www.accessfund.org/site/c.tmL5KhNWLRH/b.7653393/k.AEEB/Conservation_Team.htm.