



Protect America's Climbing

October 17, 2016

Justin Seastrand
ATTN: National Monument Plan Amendment to Angeles National Forest
701 North Santa Anita Avenue
Arcadia, CA 91006

Via email: jseastrand@fs.fed.us

RE: San Gabriel Mountains National Monument Management Plan DRAFT Environmental Assessment

Dear Mr. Seastrand,

The Access Fund appreciates this opportunity to comment on the *San Gabriel Mountains National Monument Management Plan* DRAFT Environmental Assessment (EA).

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 supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 13,000 members and 100 affiliates. We currently hold a [memorandum of understanding¹](#) with the Forest Service to work together regarding how climbing is managed on federal land. 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

San Gabriel Mountains National Monument (Monument) provides the Los Angeles County community with outstanding opportunities for close-to-home, active outdoor recreation for the more than 15 million people who live within a 90-minute drive of the Angeles National Forest -- including populations historically limited in their access to outdoor recreation opportunities. The opportunities in the Monument offer a broad range of experiences, from highly accessible day trips for walking and picnicking to a full range of the more adventurous experiences, including technical rock climbing, prized by many of our members.

The San Gabriel Mountains National Monument affords world class opportunities for rock climbing. While there are several great areas throughout the San Gabriel Mountains to rock climb, the finest climbing resource is Williamson Rock, the premier sport climbing destination for Southern California.

¹ <https://www.accessfund.org/uploads/Access-Fund-USFS-MOU-2014.pdf>

Climbers from California and around the world have been enjoying Williamson's mild summer temperatures, proximity to Southern California's urban centers, and excellent rock quality since the 1960s.

However, access to Williamson Rock and a section of the Pacific Crest Trail have been closed since 2005 to allow the Forest Service to analyze options for allowing climbing access while protecting raptors and the endangered Mountain Yellow Legged Frog (MYLF) habitat. Since the inception of the closure, the Access Fund, Friends of Williamson Rock, Allied Climbers of San Diego, Friends of Joshua Tree and other local climbers have been working on ways to reopen Williamson Rock to climbing while protecting MYLF habitat. These efforts have included over 10 years of working directly with Angeles National Forest to devise a balanced plan, submitting numerous comment letters asking for reasonable climbing access, and an Access Fund grant funding a trail consultant to develop a proposal for sustainable access. Currently, access to Williamson Rock is still closed, but the Angeles National Forest released (August, 2014) a Notice of Intent to prepare an environmental impact statement (EIS) that would propose to reopen the Williamson Rock area to climbing and an important segment of the Pacific Crest Trail (under specific conditions) while protecting the environment (Forest Order No 01-16-01, January 14, 2015). Access Fund continues to wait for the long overdue EIS.

Sustainable Recreation

The 2012 Planning Rule defines sustainable recreation as *"the set of recreation settings and opportunities on the National Forest System that is ecologically, economically, and socially sustainable for present and future generations"* (36 CFR 219.19).² The DRAFT EA provides Desired Conditions and Management Approaches for sustainable recreation in the Monument. While the DRAFT EA decidedly bypasses management changes to Williamson Rock, we feel the DRAFT EA must acknowledge and include Desired Conditions and Management Approaches that are inclusive of potential future access to the rock climbing resources within the Monument - including Williamson Rock. The current Desired Conditions for sustainable recreation should specifically list recreational user groups including rock climbers.

Many of the Desired Conditions focus on supporting the needs of the diverse population surrounding the Monument and additional public outreach and educational initiatives to connect and engage the diverse population in the area to their public lands. The Management Approach to achieving these Desired Conditions includes, *"Prioritize work with external partners to develop sustainable recreation studies, recreation design plans, new products, or recreation design features to improve recreation management within the Monument and ensure relevance to the Monument's diverse visitor use base."*³

The Access Fund would like to continue working with the Monument to develop a sustainable recreation plan specifically to regain rock climbing access at Williamson Rock. Williamson Rock is a very important recreational climbing resource to the local, diverse climbing community in the Los Angeles region. The reopening of Williamson Rock could be achieved first and foremost through the completion

² San Gabriel Mountains National Monument Management Plan DRAFT Environmental Assessment. August 2016.

³ Ibid.

of the announced EIS (mentioned above), as well as using this Management Approach, *“Work with gateway communities and local partners to manage potential impacts and maximize potential benefits associated with Monument designation by addressing issues such as identification of appropriate access points and parking capacity at access points.”*⁴ The Access Fund would like to work with the Monument to establish sustainable approach paths and access points to Williamson Rock that protect the natural resources in the region while granting recreational access.

Social Sustainability and Access for Youth and Minority Populations

We commend the Monument for prioritizing *‘youth engagement efforts’*⁵ and *‘develop criteria for emerging uses’*⁶ within the Monument. We recommend rock climbing access be included in this Management Approach, as rock climbing continues to gain popularity in the Los Angeles region. Rock climbing gyms continue to draw large numbers of urban youth, exposing them to climbing and creating interest in outdoor climbing in a natural setting like Williamson Rock. There are limited outdoor climbing resources in the Los Angeles region; therefore, the reopening of Williamson Rock would provide an invaluable, much-needed resource for the diverse populations that live nearby. We recommend that *“rock climbing”* should be added to the following statement. *“The Monument is an important recreational setting for millions of residents in Los Angeles County and surrounding areas. For many urban residents, the Monument provides the only available and measurable open space. The site also provides general educational, cultural and recreational opportunities, including hiking, hunting, fishing, horseback riding and cycling and archeological, astronomical and geological interpretation.”*⁷

The DRAFT EA states, *“Most visitors come to know the national forests through their direct recreation experiences. Thus, it is important to provide recreation opportunities that visitors’ desire to maintain relevancy. Relevancy is affected by the forest’s ability to maintain recreation infrastructure, such as developed recreation sites and trails, that meet visitors’ needs; the diversity of forest visitors versus the diversity of the population in surrounding counties; and visitor, community and stakeholder interest in working with the forest to provide and maintain a variety of recreation opportunities and settings to meet diverse visitor needs.”*⁸ It is vitally important that the Monument continue to work towards completing the EIS and re-open Williamson Rock to climbing in an effort to remain relevant and meet visitor’s needs of their local national forest.

The DRAFT EA also states, *“It is important for recreation managers to consider the unique needs and desired recreation experiences for youth and minority populations within the range of recreation opportunities being provided within the Monument.”*⁹ The reopening of Williamson Rock would provide a desired recreation experience for youth and minority populations who may not otherwise have the

⁴ San Gabriel Mountains National Monument Management Plan DRAFT Environmental Assessment. August 2016.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Ibid.

financial means or transportation to access outdoor climbing in other portions of the state, or country, further from Los Angeles. We hope that the FINAL Monument management plan will acknowledge the high recreation value of Williamson Rock and will help to expedite the NEPA process directed at reopening access to Williamson Rock while providing protection for sensitive natural resources. Williamson Rock could once again provide local, diverse populations the opportunity to experience world-class rock climbing.

Access Fund Assistance

The climbing community and Access Fund are ready, willing, and able to help the San Gabriel Mountains National Monument improve trails and other management needs. Local climbing communities throughout California have a long history of productive 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 continue this tradition. We also provide training on management 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 Program¹⁰ or assistance from our Conservation Team¹¹ which helps maintain climbing areas throughout the United States.

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The creation of San Gabriel Mountains National Monument provides a unique opportunity for the Angeles National Forest to re-open access to Williamson Rock in an effort to follow the Monument's mandate to serve populations historically limited in their access to outdoor recreation opportunities such as the premier climbing at Williamson Rock. We request that Angeles National Forest continue to work on the Williamson Rock EIS in an effort to re-open this important recreation site that clearly supports the mission of the Monument. We look forward to continuing to build a partnership with the San Gabriel Mountains National Monument and Angeles National Forest.

Best Regards,



Erik Murdock, PhD
Policy Director
Access Fund

cc: Brady Robinson, Executive Director, Access Fund
Kenji Haroutunian, Board Member, Friends of Joshua Tree
Josh Higgins, Allied Climbers of San Diego
Liz Bergeron, Executive Director Pacific Crest Trail Association

¹⁰ See http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

¹¹ See http://www.accessfund.org/site/c.tml5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.