



25 October 2006

**wrnftmp@contentanalysisgroup.com**  
WRNF Travel Management Plan and DEIS  
c/o Content Analysis Group  
P.O. Box 2000  
Bountiful, UT 84011-2000

**Re: Access Fund Comments to Proposed White River National Forest Travel Management Plan (Travel Plan) and Draft Environmental Impact Statement (EIS)**

Dear Content Analysis Group,

The Access Fund welcomes the opportunity to comment on the proposed White River National Forest Travel Management Plan (Travel Plan) and Draft Environmental impact Statement (EIS), and applauds your efforts to involve public participation in the process. It is particularly appropriate the Access Fund work closely with the USDA Forest Service (USFS) on any management revisions concerning rock climbing given the memoranda of understanding (MOU) that the Access Fund has with the USFS relating to any climbing management initiatives within the National Forest System.<sup>1</sup>[1] We look forward to working with the USFS to preserve climbing opportunities and conserve the climbing environment in the White River National Forest (WRNF).

**The Access Fund**

The Access Fund, a 501(c)(3) non-profit advocacy and conservation organization, is the nation's largest climbers' organization, representing over 1.6 million technical rock climbers and mountaineers nationwide. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works cooperatively with public land managers on conservation projects and management planning, supports local climbing organizations, provides funding for conservation projects and scientific studies, develops and distributes educational materials, represents the interests of climbers on public policy issues, acquires and manages land, and annually sponsors over 100 Adopt-a-Crags across the country. A significant number of the Access Fund's members climb in Colorado and in particular in the WRNF.

The Access Fund works with resource managers around the country on a variety of public lands to help protect natural resources in areas visited by climbers. It is the Access

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<sup>1</sup>[1] See <http://accessfund.org/pdf/AF-03-MOU-USFS.pdf>.

Fund's experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions. We are familiar with a wide range of resource concerns and appropriate mitigation responses.

### **Standards and Guidelines for Climber-Created Trails**

Although Alternative B is the favored alternative in the EIS, we ask that the WMNF incorporate our comments governing the legitimization of climber-created trails into the Final Travel Plan irrespective of the chosen alternative. Sometimes called "social trails," climber-created trails develop as climbers make repeated visits to climbing-specific destinations that are not serviced by existing trail systems, or move around in predictable ways within a climbing area. Typically, climber trails develop in three general locations: 1) along the quickest route from a parking area to the climbing site; 2) on the simplest descent from the top of a mountain or cliff; and 3) on routes between cliffs and boulders within the climbing site.

Exploration of new climbing routes is central to the core values of climbing. Climbing previously unknown routes may explore frontiers of climbing skill—on smooth or steep sections of well-known rock faces—or more tangible frontiers such as unclimbed peaks or ranges. In remote areas, solitude and intimacy with nature are highly valued as part of the experience of climbing new routes. In general, new routes are a small but normal part of climbing activity. Oversight need not be rigorous if there is no identified threat to natural resources or other values. Many areas, including Zion and Black Canyon of the Gunnison National Parks, have traditionally kept new route logs at visitor centers to document climbing activity and assist climbers. We therefore, encourage, with the assistance of the local climbing community, the creation of standards and guidelines for climber created trails is a need common to all alternatives.

As the EIS states, many of the trails found in WMNF were originally designed to serve non-recreational uses. Some of these uses include fire and logging roads, livestock trails, and trade and travel routes. Climbers use trails to access and egress climbing areas. Unlike hiking trails that are designed, constructed, and maintained by professionals, some trails to climbing sites are created by climbers when new climbing areas are developed. Climber trails usually "follow the path of least resistance," avoiding obstacles and minimizing the effort to reach a climbing destination. In some cases trails may be ill-defined causing climbers to unknowingly take several trails to the same destination. The majority of environmental changes to trails occur during initial trail development. Once a trail becomes established, factors such as soil characteristics, topography, ecosystem characteristics, climate, and local vegetation's resistance and resilience will dictate its prominence in the landscape. Typically climber trails tend to be primitive with minimal improvements, are often sited on steep slopes, with loose soils and "scree" common.

### ***Management Practices that Work - Climber Trails***

At some point, if many climbers use an area, some degree of formalization and stabilization of climber trails may become desirable. Some climber trails may be redundant or adversely affect resource or aesthetic values. Such trails can be minimized or in some cases eliminated. Local climbing representatives can provide input on the minimum trail requirements to access climbing locations. Management response may initially include conducting a climber trail inventory. Local climbing guidebooks will often describe climber access routes, descent routes, and locations of other climbing-related trails. Consultation with a local climbing representative or arranging a joint site visit may also help with climber-trail inventory. Once trails are documented (typically GPS techniques are used), a map is created, and if necessary, a trails plan can be developed eliminating redundant or unnecessary trails. Some trails may be targeted for stabilization or upgrading to withstand heavier traffic, while others may be closed to protect sensitive resources, and replaced with new, re-routed trails. This approach was taken by managers in North Cascades National Park, WA to restore the Eldorado Creek drainage, a popular route used by climbers to access the Eldorado Glacier. The route had become deeply rutted and eroded. Following an environmental assessment, a 1300 foot section of the trail was rerouted to divert climbers to more resilient terrain which could withstand impacts the damaged area could not. This project was the first attempt by the park to rehabilitate recreational climbing impacts in a cross-country or non-trailed area. (North Cascades National Park, 1997).

Local climbing representatives may prove helpful in dispersing information concerning desired changes in climber-trail use. Other management options include signing of management-preferred trails, and brochure, kiosk, and poster information concerning site advisories or area closures. There have been many examples of successful climber trail management. At City of Rocks National Reserve, ID, climbers and hikers originally used (and then expanded) livestock trails through sagebrush vegetation. A park-wide trails plan was developed to identify a rational trails network and mitigate impacts (U.S. Department of the Interior, 1988). At Joshua Tree National Park, CA, climber-trail networks have been formalized using a special climber-specific symbol. This is produced in the form of a weather-resistant sticker that can be applied to standard trail-marking carsonite posts. The symbol (an image of a carabiner—a piece of climbing equipment) is recognizable to climbers, but not the general public (Joshua Tree National Park et al., 2000). “Cryptic” trails have also been used to limit non-climber access in areas with sensitive habitat. Such trails are designated on a park-wide trails plan but not signed to the general public. This technique has been used at Snow Canyon State Park, UT, to allow climbing access to Hidden Canyon, a narrow riparian canyon with high ecological value. Climber trails may see low traffic volume or access steep and difficult terrain, and thus may merit special design and maintenance specifications that would be inappropriate for high volume multi-visitor use trails.

## **Conclusion**

The WRNF is a unique natural area and a climbing resource of significant importance. On behalf of the American climbing community, the Access Fund appreciates the USFS’s efforts to solicit public input. We hope our comments will provide a meaningful

contribution to both the substance and clarity of the Draft Travel Plan for the WRNF regarding planning objectives and strategies.

Thank you for opportunity to provide input and please do not hesitate to call me at 303.545.6772x112 with any questions on the Access Fund's position regarding the Travel Plan.

Respectfully Yours,

Deanne Buck  
Programs Director  
The Access Fund

Cc: Maribeth Gustafson, WRNF Forest Supervisor  
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