

5 June 2007

VIA US MAIL

John F. Capell, District Ranger
Attn. Jonathan Schwartz
Santa Clara/Mojave Rivers Ranger District
30800 Bouquet Canyon Road
Saugus, CA 91390

**RE: ACCESS FUND SCOPING COMMENTS TO PROPOSED CLIMBING
ACCESS TRAIL TO WILLIAMSON ROCK**

Dear District Ranger Capell,

The Access Fund welcomes the opportunity to provide scoping comments on the USFS Angeles National Forest, Santa Clara/Mojave River Ranger District's proposal to develop a trail that will protect the Mountain Yellow-Legged Frog (MYLF) and its critical habitat, while also providing access the Williamson Rock climbing area. We applaud the Santa Clara/Mojave River Ranger District's on-going commitment to reaching out and including climbers throughout this public process.

The Access Fund

It is particularly appropriate that the Access Fund work closely with the USDA Forest Service (USFS) on any management decisions 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.¹ The Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 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 15,000 members and affiliates. California is our largest membership state.

The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. For more information about the Access Fund, visit www.accessfund.org.

Importance of Climbing at Williamson Rock

Southern California contains some of the most influential climbing areas in the history of American climbing. Modern pioneers in the sport, Patagonia's founder Yvon Chouinard and others such as Royal Robbins and Lynn Hill all "learned the ropes"

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

climbing in and around Los Angeles. Today, climbers are still drawn to the area due to the unique combination of diversity and concentration of climbing routes and proximity to a major metropolis.

Williamson Rock is an integral aspect Southern California's climbing history and culture. Due to its high elevation and proximity to the Los Angeles basin, Williamson Rock, prior to its closure in December 2005, was the most heavily used and most important resource available to climbers that live in or are visiting Southern California in the summer. Working at the Rock Gym in Long Beach, California in the mid-90s, Williamson Rock was the training ground for me and many of my colleagues. We regularly made the hour and half drive each way for a day of urban escape, nature appreciation, wildlife observation, and high quality and unique rock climbing.

Drawn by the challenge, the setting and the superb quality of routes and stone, climbers from around the world enjoy recreational climbing at Williamson Rock. It is not uncommon for Europeans to visit Williamson for a week or more while on climbing vacations en route to other climbing destination in the Western US. With climbs ranging from beginner to expert climbs, some of today's strongest climbers got their start moving up the grades on Williamson's steep, granite crags. The Access Fund is encouraged that the Santa Clara/Mojave River Ranger District acknowledges the fact that Williamson Rock provides a truly unique and important climbing experience, with climbers representing the principle recreation user group of the site.

Proposed Williamson Rock Trail

The Access Fund understands that the protection of MYLF habitat is essential to its survival and recovery. Any access trail or opening of the currently closed area must carefully consider potential impacts directly to the MYLF population as well as to the habitat. To this end, over a two-day period from December 12- 13, 2005, the Access Fund funded a survey of Williamson Rock for the primary purpose of assessing the potential human disturbance or threats to the MYLF and its habitats, particularly those related to rock climbing, and identifying possible prescriptions for the mitigation of these impacts.² This assessment was completed by Mark Hesse of the Rocky Mountain Field Institute. Accompanying Mark Hesse on his field assessment were Angeles National Forest District Resource Officer Jonathan Schwartz, Wildlife Biologist Teresa Sue, Forest Botanist Janet Nickerman, Cindy Hitchcock of US Geologic Survey, Jesse Bennett of the US Fish and Wildlife, and local climber, guidebook author and Friends of Williamson Rock founder Troy Mayr.

Mr. Hesse's preliminary assessment indicates that education, the existence of a single access trail to Williamson Rock, and the closure of all other existing 'social' trails at the site would reduce (direct climber interaction with) the MYLF and accommodate climbing access-wildlife compatibility. The following is from Mr. Hesse's Assessment:

² The assessment is based upon a rapid survey and, for this reason, is limited both in scope and detail. It is meant to serve as a cursory review of the issues and to objectively identify potential prescriptions for the mitigation of the resource threats identified.

The majority of the rock is located outside the streambed corridor and several hundred feet away from where the MYLF has been located to date. The lower sections of the rock, which include a significant portion of climbing routes, do directly abut the stream. The stream in this location, however, is either subterranean or ephemeral for a good part of the year and does not appear to provide viable habitat. In the event that a trail from Parking Lot A is established to provide access for climbers, a stream crossing can be easily constructed to avoid any disturbance to the streambed.

The establishment of a single access trail to Williamson Rock and the closure of all other existing 'social' trails at the site would help greatly to reduce threats to the Mountain Yellow-legged Frog. Historically, the rock has been accessed along two corridors from Parking Lots A and B (see Area Map- Appendix A).

The trail leading down from Parking Lot A is the best alternative for a trail for several reasons: (1) the trail provides the most direct access to the rock and is the preferred choice of climbers, (2) the trail is already in place, and little improvement or rerouting is necessary and, (3) the trail is difficult enough to discourage use from non-climbers. The trail leading down from Parking Lot B follows an abandoned road-bed. Much of the trail is located on terrain that offers a favorable gradient for a hiking trail. However, a trail in this area is not recommended because: (1) a trail in this location would be more than twice the length of Trail A, (2) the terrain on the west-side of Upper Little Rock Creek is comprised of steep, loose talus and it would require extensive work to establish, and (3) the trail in this location, because of its low level of difficulty, might draw non-climbers into the riparian area.

A trail leading from Parking Lot A would require little work to establish. For the most part, the existing trail is already located in the most ideal location, and follows a prominent rock rib. A rock retaining wall is recommended at the very bottom of the trail near the creek. However, a fair but reasonable amount of work will be required to close and restore all remaining trails.³

The access trail proposed in the Angeles National Forest's (ANF) Williamson Rock Area and Trail scoping map⁴ appears to incorporate the trail leading down from Parking Lot A, as referenced in Mark Hesse's assessment. The ANF's proposed trail also reflects recommendations by the United States Geological Society (USGS) as well. The

³ Hesse, Mark. *Williamson Rock Recreation Impact Mitigation Assessment*, December 20, 2005. (On file at the Access Fund, Boulder, Colorado).

⁴ http://www.fs.fed.us/r5/angeles/documents/Williamson_areaMap.pdf

USGS Draft Annual Report, 2003 *Natural History and Recovery Analysis for Southern California Populations of the Mountain Yellow-Legged Frog (Rana muscosa)* concluded that:

a trail could be constructed that would eliminate foot traffic from the frog area and offer a more direct route to the climbing area as well. Educational signs about the MYLF and about sound sanitation practices could also improve the current condition of the frog habitat there.

The Access Fund and our local Access Fund Affiliate, Friends of Williamson Rock, stand ready to assist the Santa Clara/Mojave River Ranger District's further exploration of the feasibility of the proposed trail.

Climbers and Conservation

The Access Fund and the local climbing community have a proud record of conservation activism regarding the many public land climbing areas found in the Southern California area. As an example of this commitment climbers in California hosted 14 Adopt-a-Crag clean-ups and trail projects in 2006. Events differ based on their locations and specific needs, but each feature an element of conservation, a sense of giving back, and a spirit of celebration.

The Access Fund's grant program regularly provides funding for management initiatives that raise awareness about climber responsibilities through stewardship projects, develop or support partnerships with resource management agencies, conservation organizations, reduce climber impacts on natural and cultural resources within the climbing environment, and develop understanding and knowledge about natural and cultural resource sensitivities where the information is used to open climbing areas or mitigate climbing impacts. Examples of grants awarded in California include:

- » Williamson Rock: Trail assessment and design in relation to climbing area and habitat of MYLF
- » Joshua Tree National Park: Vegetation surveys, and GPS location of climbing areas in relation to Threatened & Endangered species sites
- » Eastern Sierra Climbers Coalition, Bishop: Vault toilet purchase
- » Yosemite National Park: Installation of bear box food storage lockers at the base of popular Yosemite Valley climbing areas
- » Truckee Donner Land Trust: Assist in purchase of 189-acres west of Donner Lake in Billy Mack Canyon

In addition to Adopt-a-Crag and Climbing Preservation Grants, the Access Fund and its Affiliates work on-site with resource managers around the country to help protect natural resources and conserve endangered or threatened species habitat in areas visited by climbers. Climbers have been a great source of help to biologists by providing volunteer help for a range of tasks. For example, climbers have helped with monitoring, circulated local information on restrictions, positioned signs, and provided observations to resource managers on new sightings or unusual behavior. It is the Access 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.

Conclusion

The Access Fund understands the severity of the issue confronting the ANF and acknowledges its responsibility to the protection of the MYLF population. We look forward to further discussions of a trail construction which will protect the MYLF and are committed to working with the Santa Clara/Mojave River Ranger District to achieve a win-win solution.

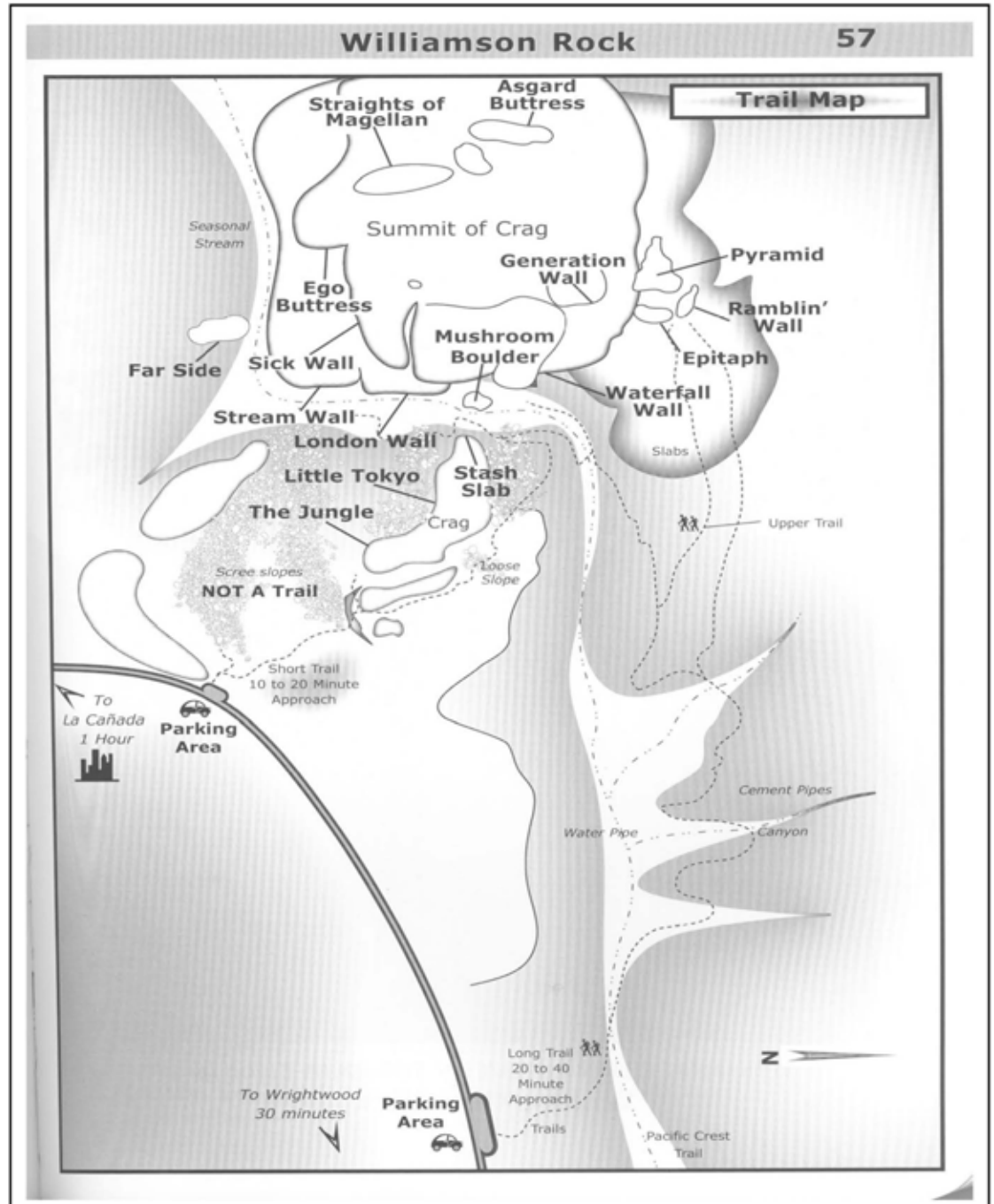
The Access Fund, along with Friends of Williamson Rock, can provide trail work, educational materials, and funding through the Access Fund's grant program to assist in the Santa Clara/Mojave River Ranger District's efforts to explore a recreation-wildlife compatible solution. Please do not hesitate to contact me at 303.545.6772 x112 with any questions, or if the Access Fund can be of assistance.

Respectfully Yours,

Deanne Buck
Programs Director
Access Fund

Cc: Jim Bedwell, USFS Director of Recreation and Heritage Resources (via email)
Chris Brown, USFS Director of Wilderness and Wild and Scenic Rivers (via email)
Jonathan Schwartz, Santa Clara/Mojave River Ranger District
Natural Resource Officer (via email)
Troy Mayr, Friends of Williamson Rock (via email)
Steve Matous, Access Fund Executive Director (via email)
Jason Keith, Access Fund Policy Director (via email)
Randy Vogel, Esq. (via email)
Mark Hesse, Rocky Mountain Field Institute (via email)

Appendix A- Area Map



Taken from *Sport Climbing Guide to Southern California*, T. Mayr. Parking Area A is at the upper left and Parking Area B in the lower center.