



August 26, 2019

Jennie O'Connor Card
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055
Submitted Via Email: jennie.oconnorcard@usda.gov

RE: Access Fund Comments on Mt. Hood National Forest Wild and Scenic River Scoping

Dear Ms. O'Connor Card,

Access Fund and the Portland Area Climbers Coalition (PACC) is writing in support of the proposed management actions related to climber education at the Klinger Spring climbing area on the East Fork of the Hood River, outlined in the Mt. Hood Wild and Scenic Rivers Planning Scoping Packet¹.

Access Fund

Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

Portland Area Climbers Coalition

The Portland Area Climbers Coalition (PACC) is a registered 501(c)(3) non-profit that is donation-based and member-driven whose mission it is to secure and maintain long-term access to climbing crags within two hours of Portland, Oregon.

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Comments

Education and Signage

Klinger Spring, including the Pete's Pile crag, is the largest climbing area in the Mt. Hood area and a valuable resource for local climbers. The area is also home to rare flora, specifically *violet suksdorfia*². Access Fund strongly believes in balancing recreational and environmental needs. The proposed educational signage on *violet suksdorfia* and rehabilitation of social trails leading through the plant's habitat will help protect the Klinger Spring-Pete's Pile area from recreational impacts while still enabling climbers to enjoy this well-established climbing area.

Visitor Use Capacity

The scoping document and River Values Report discuss visitor user capacity throughout the study area. Klinger Springs has an estimated user capacity of 20 climbers per day for the area³. This number is based on available parking and an estimate of an average climbing party size of three people per vehicle space. In the event that the Forest determines a need to limit, permit or otherwise regulate climbing use numbers at Klinger Springs, we request to be notified and involved in the process.

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 the U.S. Forest Service (USFS). Rock climbing presents USFS land managers with a unique set of management considerations as a result of activity-specific use patterns and equipment.

We recommend that the Mt. Hood National Forest include provisions that recognize rock climbing as a legitimate activity within the Wild and Scenic Rivers designations, and the conditional use of fixed climbing anchors as appropriate. Fixed anchors, defined by the Access Fund and the USFS⁴ 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 climbing thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor⁵. Fixed anchors,

²https://content.govdelivery.com/attachments/USDAFS/2019/07/24/file_attachments/1254072/Scoping%20Packet.pdf.

³ River Values Report for Nine Wild and Scenic Rivers on Mt. Hood National Forest, July 2019.

⁴ See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiate

⁵ 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).

specifically bolts, necessitate long-term maintenance. 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 frequently⁶. 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.

Access Fund Assistance

Access Fund and its extensive community of climbers, volunteers, and local climbing organizations can assist Mt. Hood National Forest with the proposed education and stewardship objectives. A significant number of the Access Fund's members live in the Northwest, in particular the Portland-metro area, and this growing community can provide the critical volunteer support to carry out restoration projects like this. Our connections to the indoor climbing population in the area also gives us an avenue for targeted education on best practices for sustainable outdoor climbing.

In addition, Access Fund's Climbing Conservation Grant Program⁷ has assisted Mt. Hood National Forest with stewardship projects at Bullo Point and French's Dome and can serve as a source of matching funds for educational signage, stewardship improvements, and restoration projects. Lastly, the Access Fund - Jeep Conservation Teams⁸ can provide a breadth of experience in professional stewardship and trail crew and volunteer leadership in partnership with the US Forest Service on any future initiatives considered in this scoping process.

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⁶ See

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

⁷ http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁸ http://www.accessfund.org/site/c.tml5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

We look forward to the development of a management plan for the East Fork of the Hood River and are available to assist with any climbing-related topics that may arise. Feel free to contact me directly anytime at katie@accessfund.org or by phone 303-552-2843.

Sincerely,

A handwritten signature in black ink that reads "Katie Goodwin". The signature is written in a cursive, flowing style.

Katie Goodwin - Access Fund Policy Analyst

A handwritten signature in orange ink that reads "Nate Ball". The signature is written in a cursive, flowing style.

Nate Ball- Portland Area Climbers Coalition

CC:

Chris Winters- Access Fund Executive Director

Joe Sambataro - Access Fund Northwest Regional Director

Erik Murdock- Access Fund Policy Director