



March 15, 2017

Wisconsin Department of Natural Resources
Attn: Thomas Meyer
Wisconsin DNR, NHC/6
PO Box 7921
Madison, WI 53707
P: 608-266-0394
Submitted via Email: Thomas.meyer@wisconsin.gov

RE: Wisconsin DNR 2017 Tier 3 State Natural Area Management Plan

The Wisconsin Climbers Association (WCA) and Access Fund, appreciate the opportunity to comment on the Wisconsin Department of Natural Resources (DNR) 2017 Tier 3 State Natural Area Management Plans. We request rock climbing be recognized as an appropriate recreational activity in State Natural Areas (SNA), specifically Ableman's Gorge SNA currently under review in the Tier 3 plan.

Access Fund

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 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 15,000 members and over 100 local affiliates. 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.

Wisconsin Climbers Association

The Wisconsin Climbers Association (WCA) is a voice for the Wisconsin climbing community. Our goal is to foster community connections, address climbing access issues and promote land stewardship. For more information on WCA, visit <https://wisconsinclimbersassociation.wordpress.com>.

COMMENTS

The DNR has developed DRAFT management plans for 13 SNAs in Wisconsin. These 13 SNAs are open to the public for a wide range of recreational opportunities including hiking, skiing, fishing, hunting, and trapping; one of the SNA goals is to provide unique recreational opportunities as well as provide habitat for plants and wildlife.¹ Ableman's Gorge SNA is of particular interest to rock climbers due to the 100-200 foot cliffs formed by the Baraboo River², this geologic feature is a quartzite and sandstone conglomerate making for excellent rock climbing features. Currently the DNR does not permit rock climbing in the majority of SNAs in Wisconsin, including Ableman's Gorge SNA.

According to Wisconsin State Legislature, NR 1.32 Natural areas and scientific areas, NR1.33 Policy on rock climbing:

*'Rock climbing is a traditional recreational activity that may occur on non-designated use areas on department lands, and is consistent with the department's mission to provide recreational opportunities to the public. Rock climbing should be considered in master planning for department properties which contain areas where rock climbing may occur.'*³

History of Rock Climbing in Ableman's Gorge

The history of rock climbing at Ableman's Gorge goes back over 50 years. Dating back to the mid-1960s, the climbing opportunities were first explored by the University of Wisconsin Hoofers Mountaineering Club (before Ableman's was designated a State Natural Area). Over the 30 years from the 1960s to the 1990s climbing routes were also explored and documented by members of the Chicago Mountaineering Club and the Devils Lake climbing organization (DLFA), as well countless unaffiliated climbers.

The general climbing quality of rock at Ableman's Gorge is similar to Devils Lake State Park, which currently permits rock climbing. The particular Baraboo quartzite found at Ableman's presents smaller formations, with fewer cracks and more rock texture than Devils Lake State Park. The historic climbing routes at Ableman's range from beginner to expert level, offering opportunities for all climbing abilities. Easy access from the road makes a few routes here potentially suitable for adaptive climbing (aimed at those with disabilities), something that is very difficult to find at Devils Lake.

Rock climbing was banned at Ableman's Gorge in the 1990s, despite the objections of the Rock Climbing Technical Advisory Committee, a group of citizens convened by Wisconsin DNR to discuss climbing access and management. At that time, rock climbing was banned in all but two State Natural Areas, East Bluff at Devils Lake, and Dells of the St. Croix in Interstate Park. The remainder of SNAs were closed to rock climbing without acknowledging the extensive climbing

¹ See: <http://dnr.wi.gov/topic/Lands/MasterPlanning/tier3.html>

² See <http://dnr.wi.gov/topic/lands/masterplanning/documents/MP-NA-AbelmansGorge-2017.pdf>

³ https://docs.legis.wisconsin.gov/code/admin_code/nr/001/1/32

history in these areas, and without clear documentation or justification for the blanket closure of rock climbing in SNAs. No documented impacts to geologic features or natural resources were recorded related to rock climbing in Ableman's Gorge prior to its closure, the new master plan should reopen this site to climbing.

Recommendations

WCA and Access Fund request the DNR include rock climbing as an appropriate activity in SNAs, specifically Ableman's Gorge SNA. Rock climbing has a long history in Wisconsin including Ableman's Gorge SNA. We strongly support management plans that allow responsible recreation, such as rock climbing, to co-exist sustainably with natural and cultural resources. By designing a management plan that recognizes the activity of rock climbing as outlined in NR 1.33⁴, proper planning and design can be implemented to allow sustainable access to rock climbing while preserving the natural environment.

Climbing Community Assistance

The WCA, Access Fund and the climbing community are ready, willing, and able to help the DNR improve access trails and develop management strategies to access rock climbing in Ableman's Gorge. Local climbing communities throughout Wisconsin have a long history of positive environmental stewardship and collaboration with government agencies at all levels of government, private land owners and other organizations to protect this wonderful, highly-valued resource. Access Fund strives to work with local climbers and land managers to address these needs. We also provide training on planning and stewardship best practices to keep those areas healthy. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program⁵ or assistance from our Conservation Team⁶ which helps maintain climbing areas throughout the United States.

*

*

*

⁴ https://docs.legis.wisconsin.gov/code/admin_code/nr/001/1/32

⁵ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁶ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Thank you for your consideration of these comments on the Wisconsin Department of Natural Resources (DNR) 2017 Tier 3 State Natural Area Management Plans. The Access Fund and the WCA have the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health and integrity of Wisconsin DNR State Natural Areas. The Access Fund and WCA look forward to continuing to work with DNR. Please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the staff to seek input from diverse groups and interests. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Sincerely,



Katie Goodwin
Public Lands Associate, Access Fund



John Dobbe
Wisconsin Climbers Association

Cc:

Brady Robinson, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director