



Protect America's Climbing



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ATTN:

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Submitted via email: [r5planrevision@fs.fed.us](mailto:r5planrevision@fs.fed.us)

**RE: Comments on Draft Environmental Impact Statement for the Inyo, Sequoia, and Sierra National Forests Land Management Plans**

Dear Forest Planning Team:

The Access Fund and American Alpine Club appreciate this opportunity to provide feedback on the Draft Environmental Impact Statement (DEIS) for the Inyo, Sequoia, and Sierra National Forests Land Management Plans. The Inyo, Sequoia and Sierra National Forests provide some of our country's highest quality, world-class climbing opportunities that range from big-wall backcountry wilderness adventures to frontcountry bouldering test-pieces. Some of the huge, monolithic granite formations of the Sierra Nevada National Forests are not only revered by rock climbers throughout California, but also worldwide. We appreciate that climbing is acknowledged as one of the many recreational uses of the Forest.<sup>i</sup> These comments are intended to assist planners in the development of appropriate alternatives for wilderness recommendations that enhance and protect climbing access, while maintaining the wilderness character of the National Forests.

**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 and accredited land trust supporting and 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 13,000 members and 100 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.<sup>ii</sup> The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. California is one of our larger member states and many of our members regularly travel to climb in the National Forests of the Sierra Nevada mountain range. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## **American Alpine Club**

The American Alpine Club is a 501(c)(3) charitable organization whose vision is a united community of competent climbers and healthy climbing landscapes. Together with our members, the AAC advocates for American climbers domestically and around the world and provides grants and volunteer opportunities to protect and conserve the places we climb.

### **COMMENTS**

The rock climbing in the Sequoia, Sierra and Inyo National Forests is some of the most popular and prolific of its kind in the country. Each climbing area within each of the Forests is unique, and site specific considerations should determine the appropriate level of management. We have actively participated in every step of the planning process and submitted a series of comments related to rock climbing management and access in the Forests; however, we have not seen much of our recommendations, geospatial information or comments incorporated in the current DEIS. We generally support Alternative B, although the DEIS is incomplete regarding dispersed recreation as it does not include pertinent information that will substantially affect climbing management and access. The Forest Service does not appear to have evaluated a complete inventory of dispersed climbing areas (Access Fund has provided an inventory in previous comments) and associated use-patterns, and it is therefore important that the Access Fund, once again, inform the Forest Service on the climbing resources so that longstanding climbing areas, access roads and trails are identified and appropriately managed and maintained.

Currently it is difficult for us to appropriately assess the proposed wilderness recommendations given the pending status of Forest Service Manual (FSM) 2320. Without official guidance from pending FSM 2320 we are forced to take a conservative approach in our recommendations due to the fact that we do not know how rock climbing will be considered in wilderness areas under a revised FSM 2320. Furthermore, considering the lack of national-level Forest Service guidance on the use and placement of fixed anchors in wilderness (presumed to be issued through the forthcoming FSM 2320), and the fact that a relatively large amount of climbing occurs in designated wilderness and in recommended wilderness (especially in Alternative C), it is important the Forest Service is aware of the locations and best practices associated with rock climbing. These comments are intended to assist the Forest Service to ensure that climbing access is protected, and appropriate management prescriptions and designations enhance these nationally-significant climbing opportunities.

### **Desired Conditions**

The Access Fund recommends that the following Desired Conditions be included in the Forest plans:

1. Recreation management must include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity and the conditional use of fixed climbing anchors as appropriate.

2. Rock climbing destinations are places of special recreational significance and are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support.
3. Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
4. Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.

### **Climbing in Wilderness and Fixed Anchors**

Climbing is considered an appropriate wilderness activity<sup>iii</sup>; however, not all types of climbing activities are suitable within designated wilderness areas. In general we support wilderness recommendations where they do not conflict with established climbing areas and/or jeopardize access to climbing destinations. Fixed anchors<sup>iv</sup>, although conditionally allowed in most Forest Service, Bureau of Land Management and National Park Service wilderness areas, can be problematic with regard to wilderness management.<sup>v</sup> Fixed anchors, defined by the Access Fund and the Forest Service,<sup>vi</sup> 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 routes thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in wilderness.<sup>vii</sup>

Fixed anchors, specifically bolts, necessitate long-term maintenance.<sup>viii</sup> 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 frequently.<sup>ix</sup> Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts.<sup>x</sup> Motorized drills are specifically prohibited in designated wilderness and often (but not necessarily) prohibited in recommended wilderness areas. Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Sequoia, Sierra and Inyo National Forests wilderness inventory) depend on long term stewardship in order to maintain the established climbing routes and descents.

We believe that extensive, well developed, existing climbing areas are “substantially noticeable”<sup>xi</sup> and should thereby be excluded from wilderness recommendations in order to prevent undesirable future management issues. The Forest Service Land Management Planning Handbook clearly states that “[a]s a general rule, developed sites should not be included [as wilderness]”.<sup>xii</sup> The climbing areas highlighted in the following section of these comments are well-established and some were developed as early as the mid-1960s. These “developed sites” are “substantially noticeable”, and should not be recommended as wilderness in order to effectively maintain the exceptional climbing opportunities of today into the future.

The Sierra, Sequoia and Inyo Forests should articulate a clear fixed anchor policy to promote climber safety in wilderness and non-wilderness areas. Fixed anchors are unobtrusive, and typically not visible to forest visitors. Fixed anchors should be permitted across all ROS categories (with appropriate management). Fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary. For more information of fixed anchor technology and best practices visit: <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors>.

## **Economic Benefits of Climbing**

Recreation-based tourism boosts local economies near National Forests across the United States. Rock climbing participants continue to grow in proportion to other recreation user groups and it is likely that public demand for activities such as rock climbing will increase relative to other outdoor activities in the near future. In fact, several recent economic studies indicate the benefits of climbing on local communities.<sup>xiii</sup> Tourism from climbing “contributes to the economic stability of some local communities,” as expressed by Sequoia. The Red River Gorge located in the Daniel Boone National Forest, Kentucky recently published an economic impact study citing, visitation to the Forest for rock climbing brought \$3.6 million dollars into the region in one year.<sup>xiv</sup> We ask that the Sierra, Sequoia and Inyo acknowledge the economic contributions of rock climbing when evaluating the Forests socioeconomic impact on local communities, and consider that information when identifying potential projects. We encourage the USFS partner with local climbing organizations to collect economic data related to climbing, in order to better evaluate the economic impact of climbing on the forest.

## **Climbing Access**

The Access Fund maintains that rock climbing is an appropriate activity across the Forests and all ROS categories.<sup>xv</sup> Climbing is a relatively low impact activity that can be managed sustainably to the mutual benefit of the public and the Forest. Therefore, access to climbing resources should be maintained and protected. Climbers have well-established record of supporting natural and cultural resource based closures and restrictions. We ask that closures be well-substantiated and lifted when determined unnecessary. Clear and timely information (on closures, trail conditions, use patterns etc.) will facilitate positive outdoor recreation experiences and reduce conflict amongst visitors.

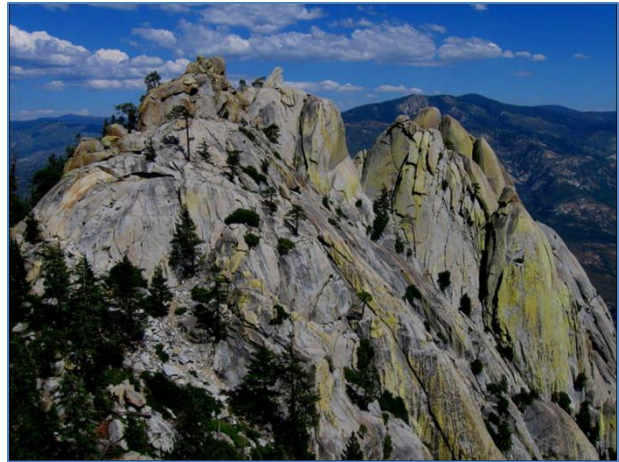
The Access Fund offers to partner with the Sierra, Sequoia, and Inyo Forests to work on improving existing access trails and paths to established climbing areas. By allowing the Access Fund<sup>xvi</sup> and affiliated local climbing organizations to assist the Forest Service in stabilizing main access paths and trails and reclaim braided social trails, climbers can minimize their impact while hiking and improve erosion control. Existing infrastructure should be maintained and potentially expanded in established sport climbing or bouldering areas which see a higher volume of climbers.

The Access Fund encourages improving climbing access for all of the public (particularly for children and low-income users). By developing partnerships with the Access Fund and other like-minded organizations we can work to deepen connections between the Forest and the broader public. The Access Fund is committed to educating young climbers on best practices while climbing and visiting natural landscapes and wilderness, and has recently initiated an education program directed at

facilitating environmentally responsible transitions from indoor gym climbing to climbing outdoors – a new trend that is driven by the popularity of indoor climbing gyms. Access Fund currently organizes an educational outreach program called ROCK Project<sup>xvii</sup> which connects with large metropolitan based climbing gyms throughout the country to connect urban climbers with the technical skills they need to climb outside as well as promote stewardship of their local outdoor climbing area. We hope that the Forests will continue to manage rock climbing resources in a manner that balances access to recreation and conservation of the climbing environment.

### **Recommendations for Sequoia National Forest**

Sequoia National Forest is fortunate to offer some of the most spectacular climbing opportunities in the country. Hermit Spires was first climbed by Fred Beckey in 1969 and the Needles climbing area (pictured), within Sequoia National Monument, is a destination for domestic and international climbers.



We generally support the Preferred Alternative-Alternative B. We offer the following comments to further articulate the importance of existing climbing areas in the Sequoia National Forest that should be recognized in the Forest Plan as valuable recreational resources.

The Needles, Domeland Wilderness, Kern Plateau and other well-established climbing areas have fixed anchors that warrant long-term maintenance. The following areas should be recognized as approved climbing areas within the Forest and the use and maintenance of fixed anchors should be allowed where appropriate.

*Domeland Wilderness Place (Domelands):* A well-established climbing destination with its own climbing guidebook.<sup>xviii</sup> It features long, high quality granite traditional climbs particularly on Bart Dome and Church Dome. Sequoia should recognize Domelands as an established climbing area and develop a common sense fixed anchor policy (described above) for the area.

*Kern Plateau Place:* Add rock climbing to the intended uses of this area. There is extensive climbing on the plateau's featured granite domes.

*Lower Kern River Place:* Add rock climbing to the intended uses of this area. Specifically as a bouldering destination.

*The Needles:* Add rock climbing to the intended uses of this area. There is extensive traditional climbing featured on the large granite features known as the Needles. The Needles has one of the highest

densities of classic (world renowned) routes anywhere, attracting climbers from around the world. We oppose any wilderness designation that threatens the long established history of sport climbing in the Needles. We request that the Needles be prioritized when considering wildfire mitigation as a “key resource,” particularly considering the 2011 fire in the Needles.

The table below lists the location of the climbing areas and the associated wilderness inventory polygons that we recommend be removed from Alternative C, or adjusted to exclude valuable climbing resources.

<b>Sequoia National Forest: Recommendations for Alternative C removal or polygon boundary adjustment</b>				
<b><i>Polygon ID</i></b>	<b><i>Evaluation Polygon Name</i></b>	<b><i>Climbing Area</i></b>	<b><i>Coordinates</i></b>	<b><i>Description</i></b>
1387	North Fork Kern adjacent to Golden Trout Wilderness	Hermit Spires	36.1686, -118.5130	Several established climbing routes, dating back to 1969.
1387	North Fork Kern adjacent to Golden Trout Wilderness	The Needles	36.1069, -118.4795	Approximately 1,000 established climbing routes, traditional and sport, dating back to 1970.
1387	North Fork Kern adjacent to Golden Trout Wilderness	Dome Rock	36.0666, -118.5307	Over 20 established climbing routes dating back to 1975.
1394	Domeland/ Woodpecker Roadless Area, Adjacent to Domeland Wilderness	Kernville Rock	35.7563, -118.3784	Over 20 established climbing routes dating back to 1974.
1394	Domeland/ Woodpecker Roadless Area, Adjacent to Domeland Wilderness	Church Domes/The Rectory	35.8513, -118.2711	Multiple established climbing routes, traditional and sport, dating back to the 1990’s.
1425	Delonegha Creek	Kern Canyon Dome	35.5865, -118.5409	Multiple established climbing routes, traditional and sport.

**Recommendations for Sierra National Forest**

Sierra National Forest is also fortunate to offer exceptional climbing opportunities. Shuteye Ridge (pictured) and Courtright Reservoir include many climbing routes (some established in the early 1980s) on large, high quality granite domes only a couple hours drive from urban areas. These well-established climbing areas have fixed anchors that warrant long-term maintenance efforts. Currently Southern Sierra Wilderness prohibits commercial enterprises. Please acknowledge commercial guiding, as guiding presents an alternative method to bring children and underserved populations out into the Forest and in many cases can reduce impacts through teaching low-impact climbing practices to clients. The table below lists the location of the climbing areas and the associated wilderness inventory polygons that we recommend are removed from Alternative C, or adjusted to exclude valuable climbing resources.



<b>Sierra National Forest: Recommendations for Alternative C removal or polygon boundary adjustment</b>				
<b><i>Polygon ID</i></b>	<b><i>Evaluation Polygon Name</i></b>	<b><i>Climbing Area</i></b>	<b><i>Coordinates</i></b>	<b><i>Description</i></b>
539	Adjacent to Dinkey Lakes Wilderness	Trapper Dome	37.1029, -118.9884	Over 20 established climbing routes dating back to the 1980's.
1378	Adjacent to John Muir and Monarch Wildernesses	Slasher Dome	36.9015, -118.9418	Multiple established climbing routes, traditional and sport, dating back to the 1980's
646	Shuteye	50 5.7 Dome	37.3689, -119.4230	Multiple established sport climbing routes.
646	Shuteye	Big Sleep	37.3405, -119.4224	Multiple established traditional climbing routes.
646	Shuteye	Chiquito Dome	37.3783, -119.4022	Multiple established traditional climbing routes.
646	Shuteye	Crocodile Dome	37.3413, -119.4162	Multiple established climbing routes, traditional and sport.
646	Shuteye	Dreamscape	37.3839, -119.4404	Multiple established sport climbing routes dating back to the early 2000's.
646	Shuteye	Eagles Nest	37.3370, -119.4128	Multiple established sport climbing routes dating back to the early 2000's.
646	Shuteye	Gray Eagle	37.3652, -119.4135	Multiple established climbing routes, traditional and sport, dating back to the early 2000's.
646	Shuteye	High Eagle	37.3736, -119.4280	Over 20 established climbing routes, traditional and sport, dating back to the early 2000's.
646	Shuteye	Midway Dome	37.3459, -119.4200	Multiple established climbing routes, traditional and sport, dating back to the early 2000's.
646	Shuteye	Red Eagle	37.3601, -119.4098	Multiple established climbing routes, traditional and sport, dating back to the early 2000's.
646	Shuteye	Shangri La	37.3797, -119.4352	Multiple established climbing routes, traditional and sport, dating back to the early 2000's.

## **Summary of Recommendations**

Access Fund generally supports the Preferred Alternative - Alternative B. We request a revised DEIS be released for public comment prior to issuing the final EIS to adequately address several issues that are currently not included in the DEIS. We do not support wilderness recommendations for areas that already contain a substantial amount of established rock climbs, primarily under Alternative C. Most of the existing climbing areas within the forests use fixed anchors (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to climbing community. Climbing resources in Inyo, Sequoia, and Sierra National Forests provide the public with unique opportunities to experience primitive, human-powered recreation in beautiful settings. Longstanding, developed climbing areas within recommended wilderness invite controversial management issues that are avoidable.

Preventing these types of issues is in alignment with the Forest Service's Sustainable Recreation framework, as well as its commitment to support appropriate forms of recreation such as climbing. The Access Fund maintains that rock climbing is an appropriate activity across the Forests and all ROS categories. Climbing is a relatively low impact activity that can be managed sustainably. The Access Fund offers to partner with the Sierra, Sequoia and Inyo Forests to work on improving existing access trails and paths to established climbing areas. The Access Fund encourages improving climbing access for all of the public.

### **Access Fund Assistance**

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the Forest may require to provide for the world class opportunities found in Sequoia, Sierra and Inyo National Forests. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>xix</sup> or assistance from our Conservation Team<sup>xx</sup> which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

\* \* \*

Thank you for your consideration of these comments on the DEIS. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (720-588-3512) or email ([erik@accessfund.org](mailto:erik@accessfund.org)) to discuss this matter further.

Best Regards,



Erik Murdock  
Policy Director  
The Access Fund

Cc: Brady Robinson, Access Fund, Executive Director  
Maria Mallard, American Alpine Club, Policy and Advocacy Director

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<sup>i</sup> Draft Assessment of Sequoia, Sierra and Inyo National Forests

<sup>ii</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration\\_with\\_federal\\_agencies.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm).

<sup>iii</sup> National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012 state that climbing is an appropriate wilderness activity. The USDA National Forest Service has yet to issue a national policy on wilderness climbing; however, climbing is allowed in most every national forest



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with climbing resources. There are approximately 7,000 climbing areas in national forest wilderness (source mountainproject.com).

<sup>iv</sup> [https://www.accessfund.org/uploads/pdf/AF-AAC\\_FixedAnchorPolicy\\_20150428.pdf](https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf)

<sup>v</sup> National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012

<sup>vi</sup> Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, *Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness*, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>

<sup>vii</sup> 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). Doctoral Dissertation, University of Arizona.

Reighart, S. (2007). *Rock Climber Perspectives on Management Issues in the Red River Gorge* (Unpublished). Thesis, Ohio State University.

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

<sup>ix</sup> Id.

<sup>x</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

<sup>xi</sup> The Wilderness Act states that wilderness "(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable . . ." (16 U.S.C. 1131c).

<sup>xii</sup> Forest Service Handbook 1909.12 – Land Management Planning Handbook, Section 71.22b, number 7.

<sup>xiii</sup> See <http://www.climbingmanagement.org/issues/economic-benefits-of-climbing>

<sup>xiv</sup> See <https://www.accessfund.org/uploads/RRG-EIS-final.pdf>

<sup>xv</sup> See [http://www.fs.fed.us/cdt/carrying\\_capacity/rosfieldguide/ros\\_primer\\_and\\_field\\_guide.htm](http://www.fs.fed.us/cdt/carrying_capacity/rosfieldguide/ros_primer_and_field_guide.htm)

<sup>xvi</sup> See <https://www.accessfund.org/meet-the-access-fund/our-approach/stewardship-conservation>

<sup>xvii</sup> See <https://www.accessfund.org/meet-the-access-fund/our-approach/education/rock-project-tour>

<sup>xviii</sup> Vernon, Greg. 1992. *Southern Sierra Rock Climbing: Domelands*. Globe Pequot Press

<sup>xix</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm).

<sup>xx</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm).