



Protect America's Climbing

October 31, 2012

Karen Taylor-Goodrich, Superintendent
ATTN: Wilderness Stewardship Plan Preliminary Draft Alternatives
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9700

RE: Access Fund Comments for Sequoia and Kings Canyon National Park Wilderness Stewardship Plan, Preliminary Draft Alternatives

Dear Ms. Taylor-Goodrich,

The Access Fund appreciates this opportunity to comment on the Preliminary Draft Alternatives of the Wilderness Stewardship Plan (WSP) proposed for Sequoia and Kings Canyon National Park (SEKI) wilderness. We understand that this WSP will not contain alternatives for managing rock climbing, but that it may provide guidelines for its management.ⁱ The Access Fund can provide climbing management expertise, funding, and community outreach to assist the National Park Service (NPS) manage climbing within the SEKI's wilderness areas.

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 supporting and representing over 2.3 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 11,000 members and 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.ⁱⁱ California is our largest member state and many of our members regularly travel to climb in California, including within SEKI's wilderness areas. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

Wilderness Climbing and Fixed Anchors

The use of fixed anchors is a significant need for climbers and sometimes a concern for land managers, especially in designated wilderness areas. Since 1989, the Access Fund has been working with all of the federal agencies to resolve the issue of how fixed anchors should be managed in wilderness. We also have negotiated directly with land managers and the

environmental community to achieve broad support for a national policy which allows, but limits, the use of fixed anchors in wilderness.

The Access Fund believes:

- Some level of fixed anchor use must be allowed wherever climbing is allowed. The appropriate level of use should be established on an area-by-area basis.
- Climbers guided by clear policy and local ethics, not the government, bear the primary responsibility for determining when to place and re-place fixed anchors and how to use these tools.
- The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. Allowing the use of fixed anchors, if properly managed, does not degrade wilderness characteristics.
- Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited.
- The Access Fund supports the ban on power drills in wilderness and actively promotes the concept that in wilderness bolts are a "tool of last resort."

In 1996, the Sawtooth National Forest Supervisor made a controversial decision to prohibit the placement of new fixed anchors in the Sawtooth Wilderness. The Access Fund immediately appealed the decision, and the Forest Service responded by instituting a negotiated rulemaking process to clarify national policy about fixed anchor use in wilderness areas. In 2000, the Secretary of Agriculture established a negotiated rulemaking committee called the *Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee* (the Negotiated Rulemaking Committee). The Negotiated Rulemaking Committee comprised of 23 stakeholders including the Access Fund, Forest Service, National Park Service (NPS), Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (FWS) was formed to develop recommendations for a proposed rule regarding fixed anchors in designated wilderness.

The Negotiated Rulemaking Committee reached the following consensus:ⁱⁱⁱ

- Bolt-intensive climbing is generally incompatible with wilderness.
- Leave-no-trace or clean-climbing ethics should be integrated into a rule.
- Via a climbing management plan, the limited use of fixed anchors should be allowed.
- Crafting a rule allowing fixed anchor use in wilderness is permissible under the Wilderness Act.

BLM was the first to incorporate the Negotiated Rulemaking Committee's findings into a national policy in *BLM Instruction Memorandum No. 2007-084- Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM*. The Forest Service has yet to propose a national rule or policy regarding fixed anchor use in wilderness. The issue has

generated controversy since the 1990s. In January 2011, the National Park Service released a draft version of Director's Order 41 Wilderness Stewardship (DO 41) for public review. DO 41, Section 7.2 Climbing reflects the consensus reached by the Negotiated Rulemaking Committee for managing fixed anchors in wilderness. Subject to a few concerns, the Access Fund generally supports the policy for managing fixed anchors in wilderness espoused by DO 41 and BLM Instruction Memo No. 2007-084- Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM.

In addition to DO 41, NPS can utilize the proven wilderness climbing management plans and policies used by [Rocky Mountain](#), [Zion](#), and [Yosemite](#) National Parks as models for SEKI's wilderness. Each of these National Parks is a world-renowned climbing destination that has experience successfully managing climbing and preserving wilderness characteristics. Each of these plans provide programmatic guidance for placing new and re-placing existing fixed anchors without arbitrary bolting standards or complex permitting processes.

Climbing and Cultural Resources

The Access Fund advocates for land management policies that support climbing access and conservation of public lands. We believe in protecting cultural resources and Native American heritage, and recognize that public land managers must balance recreational access with resource protection which sometimes may include restrictions to protect cultural resource values. The Access Fund supports management decisions based on a thorough understanding of public use patterns and their effects on known and identifiable cultural resources. The use of baseline data and public involvement (with due regard to the protection of confidential tribal information) is critical to making informed management decisions that protect these resources and allow public access. The Access Fund Climbing Preservation Grant Program provides funds for research, monitoring, educational outreach, and stewardship projects at climbing areas around the country. Specific climbing management related components of this Draft Plan may be appropriate for Access Fund grant support. The Access Fund and local climbers can provide volunteers, funding, educational outreach and local expertise.

Best management practices are well established regarding climbing access and cultural resource protection. The Access Fund supports protective measures that minimize access restrictions, including posting appropriate educational information about the resource, constructing physical barriers to protect specific locations, and limiting climbing within an appropriate buffer around a discrete cultural resource site. Regarding sacred sites with no discrete cultural resources, the Access Fund supports clear management policies that accommodate ceremonial use of Native American sacred sites and avoid adverse effects to the site's physical integrity. The Access Fund opposes landscape-scale closures or restrictions for sacred site protection based solely on religious preferences where specific cultural resources are not present or may be protected by other means. The Access Fund supports voluntary limits on climbing on or around designated

sacred sites in conjunction with public educational efforts concerning the sensitivities of these locations. The Access Fund can help educate climbers about the area's cultural significance and the appropriate use.

Commercial Guiding in SEKI's Wilderness Areas

The Access Fund supports allowing continued opportunities for the public to access SEKI's wilderness with an accredited rock climbing guide. Hiring a professional guide allows climbers the opportunity to experience wilderness while learning valuable safety and Leave-No-Trace skills. Carefully managing the number of and requirements to obtain a guiding permit are the best means for preserving the wilderness climbing experience within SEKI.

Access Fund Assistance

Please contact us for assistance developing a climbing management plan for the SEKI wilderness areas. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* and website www.climbingmanagement.org, have proven to be a useful tools for land managers across the country.^{iv} The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program^v or assistance from our Conservation Team^{vi} 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.

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Thank you for your consideration of climbing management for SEKI wilderness. The Access Fund has the experience, local contacts, and resources to help planners craft policy that encourages climbing while protecting wilderness characteristics. The Access Fund looks forward to participating throughout the entire planning process and in the future when climbing management is more fully considered. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,



R.D. Pascoe
Policy Director
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Scott Massey, American Mountain Guide Association
Leigh Goldberg, American Alpine Club
Torey Ivanic, Southern Sierra Climbers Association

ⁱ Climbing – Technical rock climbing within SEKI’s wilderness is relatively common. The WSP will not explore alternatives for this activity, but may provide guidelines for its management. The NPS is currently updating Director’s Order 41 (Wilderness Management), which will address climbing in wilderness. When enacted, SEKI will use it to guide the management of climbing activities, such as the placement of bolts and the use of power drills, in wilderness. A Climbing Management Plan may be developed in the future. Supplemental and Background Information (330.7 KB, PDF file) page 4.

<http://parkplanning.nps.gov/document.cfm?parkID=342&projectID=33225&documentID=49956>

ⁱⁱ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm

ⁱⁱⁱ See <http://www.fs.fed.us/t-d/pubs/htmlpubs/htm01232826/page03.htm>

^{iv} See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

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

^{vi} See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.