



Protect America's Climbing

January 11, 2013

Karen Beppler-Dorn  
Superintendent  
Pinnacles National Monument  
5000 Highway 146  
Paicines, CA 95043

**RE: Access Fund Comments for Pinnacles National Monument - Draft General Management Plan and Environmental Assessment**

Dear Planning Team,

The Access Fund welcomes this opportunity to comment on the *Draft General Management Plan and Environmental Assessment* (GMP) proposed for Pinnacles National Park<sup>1</sup> (Pinnacles). Pinnacles recreation includes both outstanding front-country and remote wilderness climbing opportunities. The Access Fund appreciates that the Draft GMP acknowledges climbing as a historical and appropriate use of Pinnacles, and that all the planning alternatives outlined in this Draft GMP will continue to provide or expand opportunities for existing recreational uses such as climbing. We also appreciate the GMP's commitment to continue working with the climbing community, in particular the Friends of Pinnacles. We hope these comments assist National Park Service planners to adopt appropriate climbing management policies at this important and historic climbing area.

**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 organization 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.<sup>2</sup> California is our largest member states and many of our members regularly travel to climb at Pinnacles

The Access Fund has a long history of cooperative assistance at Pinnacles as far back as 1992 when we worked with the National Park Service and Friends of Pinnacles on a brochure promoting conservation and safe climbing practices at Pinnacles. In 2000, we awarded a \$3,000 climbing preservation grant to Pinnacles National Monument for raptor monitoring, and in 2008 we submitted comments to the preliminary alternatives for the Pinnacles' General Management Plan.<sup>3</sup> We generally support the selection of Alternative D for this GMP and remain very interested in any subsequent initiatives at Pinnacles focused on climbing management. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

## COMMENTS

The Access Fund endorses Alternative D because this management direction will result in better facilities, more trails, backcountry camping on the West Side of Pinnacles, and increased educational and cultural opportunities. While Alternative D's reduced parking access may have negative effects on climbers, we believe that a subsequent climbing management plan (or other related plan) could include this topic in its scope. We believe that the other alternatives outlined in the Draft GMP could have negative impacts on camping, climbing access, and the climbing environment generally. Alternative D strikes the right balance.

The Draft GMP notes that while this GMP does not establish any specific policies related to climbing, a climbing management plan (CMP) will be developed in the next few years. The Draft GMP notes that climbing use would continue in balance with raptor advisory updates and voluntary closures. We support a subsequent planning initiative focused on climbing management and look forward to working with Pinnacles planners in this regard. Nonetheless, we provide a few climbing management recommendations below related to fixed anchors, cliff nesting raptors, and cultural resources for Pinnacles planners to consider.

### **Fixed Anchors**

Because most of the climbing at Pinnacles is located in designated wilderness, wilderness management guidelines are central to how climbing should be managed at Pinnacles. As you know, in January 2011 the National Park Service released a draft version of Director's Order #41 on Wilderness Stewardship (DO 41)<sup>4</sup> including a section on climbing. This Draft DO 41 reflects policy recommendations reached by the US Forest Service's Negotiated Rulemaking Committee for managing fixed anchors in wilderness from the 1990s. These recommendations were largely adopted by Bureau of Land Management in its Instruction Memo No. 2007-084.<sup>5</sup> The Access Fund submitted detailed comments to the Draft DO #41<sup>6</sup> that reflected our longstanding work on this topic included during both the USFS and BLM wilderness fixed anchors management policy initiatives. As stated in the Draft GMP, we understand that this plan will follow the guidance recently developed and articulated DO 41.

We believe that concerns regarding fixed anchor use in Pinnacles Wilderness can be ameliorated with proper management. In addition to the provisions in DO 41, existing management strategies in use around the country have successfully managed climbing access while preserving wilderness characteristics. In particular, Pinnacles planners can utilize the proven wilderness climbing management plans and policies of Rocky Mountain,<sup>7</sup> Zion,<sup>8</sup> and Yosemite<sup>9</sup> national parks as models for wilderness climbing within Pinnacles. Each of these National Parks is a world-renowned climbing destination that has experience successfully managing climbing and preserving wilderness characteristics. We encourage planners to consult with these parks to better understand how successful these basic policies have been at these popular wilderness climbing areas.

### **Climbing and Cliff Nesting Raptors**

Pinnacles planners note that a major consideration in this Draft GMP is the management of sensitive wildlife species and associated habitat. We support continuing the policy of working with the Friends of Pinnacles on voluntary seasonal closures at some formations help to protect

raptors. It is the wildlife and natural beauty of places like Pinnacles that attract climbers, and protecting an area's ecology is central to conserving the climbing experience. Accordingly, the Access Fund manages the largest crowd-sourced list of wildlife-related climbing closures in the country<sup>10</sup> and we work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country. We have also organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country,<sup>11</sup> which in part have focused on appropriate and effective policies for managing climbing and sensitive cliff-nesting raptors. We've found that climbing is a low impact activity that managed properly poses no threat to cliff dwelling raptors, such as condors, golden eagles and peregrine falcons. A combination of seasonal buffers, based on credible evidence, monitoring/data collection and expert participation can protect raptors and keep public access restrictions to a minimum. The Access Fund and local climbers have the interest, resources, and experience to assist Pinnacles protect raptors, and we also have national experts willing to provide scientific evaluation of data and comments.

### **Climbing and Cultural Resources**

The GMP also notes that Pinnacles contains significant cultural resources including archeological sites, ethnographic sites, historic structures, cultural landscapes, and museum objects. The Access Fund believes in protecting cultural resources and Native American heritage, and we 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 GMP 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. In addition to the work done by the Friends of Pinnacles, the Access Fund can help educate climbers about the area's cultural significance and the appropriate use.

## Access Fund Assistance

As Pinnacles begins its climbing management plan process, the Access Fund can provide climbing management expertise, funding, and community outreach to assist Pinnacles planners. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*<sup>12</sup> and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>13</sup> or assistance from our Conservation Team<sup>14</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.

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Thank you for your consideration of climbing management for Pinnacles. We support the selection of Alternative D for the reasons stated above and applaud the Park's continued proactive collaboration with the Friends of Pinnacles. The Access Fund looks forward to participating throughout the entire planning process. 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](mailto:rd@accessfund.org)) to discuss this matter further.

Best Regards,



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Access Fund

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<sup>1</sup> Pinnacles National Monument was designated a National Park Thursday January 10, 2013.

<sup>2</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>3</sup> See [http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CA\\_Pinnacles%20MP\\_5\\_10.22.2008.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CA_Pinnacles%20MP_5_10.22.2008.pdf).

<sup>4</sup> See <http://www.nps.gov/policy/DO-41draft.pdf>.

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<sup>5</sup> See

[http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2007/im\\_2007-084\\_.print.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2007/im_2007-084_.print.html).

<sup>6</sup> See [http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS\\_DirectorsOrder41\\_Comments\\_3.10.2011.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_DirectorsOrder41_Comments_3.10.2011.pdf).

<sup>7</sup> See Rocky Mountain National Park Backcountry and Wilderness Plan (2001), [http://www.nps.gov/romo/parkmgmt/upload/alternatives\\_2.pdf](http://www.nps.gov/romo/parkmgmt/upload/alternatives_2.pdf) at 2-40.

<sup>8</sup> See Zion National Park Backcountry Management Plan (2007), <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm>, at 47-49.

<sup>9</sup> See <http://www.nps.gov/yose/planyourvisit/bolting.htm>.

<sup>10</sup> See <http://status.accessfund.org>.

<sup>11</sup> See [www.climbingmanagement.org](http://www.climbingmanagement.org).

<sup>12</sup> See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>.

<sup>13</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>14</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).