



Protect America's Climbing

July 22, 2011

Superintendent
Sequoia and Kings Canyon National Parks
Attn: Wilderness Stewardship Plan
47050 Generals Highway
Three Rivers, CA 93271
Email: SEKI_Planning@nps.gov

Re: Southern Sierra Climbers Association and Access Fund Scoping Comments to Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan

NPS Planners:

The Southern Sierra Climbers Association (SSCA) and Access Fund welcome this opportunity to provide scoping comments to the Sequoia and Kings Canyon National Parks (SEKI) Wilderness Stewardship Plan. We hope these comments assist with the NPS's goal of fulfilling the purposes of the Wilderness Act of 1964 and develop the appropriate scope for this plan. Of particular interest to our members are guidelines and policies for technical rock climbing in SEKI including fixed hardware and maintenance. We are also interested in trails, human waste, and wildlife management. Please consider these comments when developing the scope for the SEKI wilderness plan.

Southern Sierra Climbers Association

Founded in 1996, the Southern Sierra Climbers Association is a grassroots organization dedicated to access, preservation, and education for everyone who wishes to learn about issues affecting climbing in the Southern Sierra. The SSCA is committed to securing and maintaining access to climbing areas in the Southern Sierra and unifying climbers into an effective responsible and service-oriented community. To learn more, see <http://www.facebook.com/pages/Southern-Sierra-Climbers-Association/108647937497> and www.southernsierraclimbers.org

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 10,000 members and affiliates. We advocate on behalf of approximately 2.3 million technical rock climbers and mountaineers nation-wide. The Access Fund's mission is to keep climbing areas open and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. The Access Fund encourages an ethic of personal responsibility, self-regulation,

and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment. Many of the Access Fund's members live and climb in California. For more information, see www.accessfund.org

Sequoia-Kings Canyon Climbing

Sequoia-Kings Canyon National Parks is an important resource for rock climbers and wilderness mountaineers who come here from all over California and throughout the country. The climbing at SEKI varies from short to multi-day climbs, from easy peak bagging on the Sierra's highest summits to multi-day backcountry grade VI walls climbing. Routes range in difficulty from intermediate to expert, and most climbs require at least a day's hike in. The rock here is similar to Yosemite in quality but without the crowds and pressure of more famous climbing areas. Important climb attractions include the Obelisk, Grand Sentinel, Chimney Rock, Charlotte Dome, Moro Rock, Angel Wings, and Tehipite Dome.

Given the significance of SEKI to the climbing community, SSCA and the Access Fund support reasonable and effective climbing management policies for this area that benefit climbing opportunities while providing the NPS with effective guidance that protects other important resources and values. The Access Fund would like to offer assistance towards any future management planning initiatives that involve climbing at SEKI.

Access Fund Assistance and Expertise

The Access Fund has assisted land management agencies in climbing management and general planning initiatives in the following ways:

- Work with local climbing organizations such as the Southern Sierra Climbers Association.
- Advice on visitation, use patterns, and climbing techniques and tools.
- Helping conduct and/or undertake surveys of climbing activity to determine management preferences.
- Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletter.
- Meeting and other communications with our key stakeholders to develop compromise management solutions.
- The Access Fund Climbing Preservation Grant program provides funds for research, monitoring, educational outreach, and stewardship projects at climbing areas on an annual basis.

Specific components of this Wilderness Plan may be appropriate for Access Fund grant support. In addition, please see <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf> for a copy of the Access Fund publication "Climbing Management: A Guide to Climbing Issues and the Production of a Climbing Management Plan."

This publication, now in its second edition, has proven helpful to dozens of land managers across the country who work on climbing related issues. Also please reference www.climbingmanagement.org which is a new online resource available to land managers and climbing activists that provides information on a variety of climbing management issues around the country involving federal, state, local, and private climbing properties.

Relevant Law and Policy

Earlier this year the National Park Service took public comment on its proposal to revise the agency's wilderness policies found at Director's Order #41,¹ and the Access Fund submitted detailed comments² after months of collaboration with climbing interests, the outdoor industry and wilderness organizations. While developing climbing management policies at SEKI that comply with the Wilderness Act and DO #41, planners at SEKI should acknowledge that the ability to explore the vertical wilderness, and to climb new routes that require some basic level of fixed anchor use, most closely fits Wilderness Act goals of providing "outstanding opportunities for solitude" and "primitive and unconfined type[s] of recreation." While the occasional use of fixed anchors is necessary for this type of climbing activity, the specific use and location of such new anchors is unpredictable and thus can be difficult to manage in advance. We support the following proposed guidance put forth by NPS planners for wilderness climbing:

- Climbing is in many cases a legitimate and appropriate use of wilderness.
- If significant climbing activities occur in wilderness, a climbing management plan must be prepared or be included as part of the park's wilderness stewardship plan or another activity level plan. Plans will be developed with the aid of public involvement and collaboration and will include public review and comment.
- The occasional placement of a fixed anchor for belay, rappel or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act. However, climbing practices with the least adverse impact on wilderness resources and character will always be the preferred choice.
- "Clean climbing" techniques should be the norm in wilderness.
- The use of motorized equipment is prohibited and practices such as gluing or chipping holds, and damaging or removing vegetation on or at the base of climbing routes are prohibited.
- Climbers are encouraged to adopt Leave No Trace principles and practices, to include packing out human waste when on or in the vicinity of climbing routes.
- Fixed anchors or fixed equipment may be appropriate, but should be rare in wilderness. Authorization may be required for the placement of new fixed anchors or fixed equipment. The requirements for authorization, and the process to be followed, will be effected through an approved climbing management plan.
- The establishment of bolt-intensive face climbs, such as "sport climbs," is considered incompatible with wilderness preservation and management.

For SEKI the NPS should develop criteria that would guide and direct decisions on managing new climbing routes. A first consideration for management action by the NPS should determine whether potential impacts to resources can be mitigated through climber education and outreach. We believe the NPS should focus on responding with a reasonable lesser restrictive alternative to address resource impacts rather than area closures or regulatory restrictions on use. The NPS

should also consider effective means by which it can notify the climbing public of any interim or permanent closures such as signage or media outlets.

Fixed Anchors

Climbers have a long history of working on fixed anchor policies with land management agencies. The Access Fund is currently working with the US Forest Service and National Park Service to develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas. Fixed anchors, especially bolts, are sometimes controversial. In our experience concerns about bolting are almost never related to the resource impacts that may be associated with the placement and use of these traditional climbing tools, but rather to philosophical convictions. Any decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment.

Climbing anchors are necessary for climbers to experience the unique challenges found at SEKI, however it is the Access Fund's position that fixed anchors are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for fixed anchors to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. Furthermore, the specific character of much of the rock at the SEKI requires that some level of fixed anchor use be authorized if climbing is to take place. Many technical routes at SEKI have some fixed anchors, and many future classics will require the same. Accordingly, we believe that some level of fixed anchor use must be allowed in SEKI wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations.

Trails

At present there exists a very minimal network of trails used by the climbing community to access the various climbing objectives within SEKI. The NPS should consider whether to formally acknowledge and incorporate some of these trails into SEKI's formal trail network. If trails are incorporated, the NPS should determine what level of trail development and maintenance is appropriate or required, what materials should be used, and what level of maintenance will be regularly needed, if any. In maintaining these trails, the NPS should consider working with the local climbing community and Access Fund to help build effective trails using volunteers for climbing. Climber assistance for constructing access trails has proven successful where volunteers have worked with agency officials to build trails, address erosion concerns, and better serve the needs of the user community.

Human Waste

Human waste can be a significant issue at areas that are popular climbing locations. The SEKI Wilderness Plan should consider signage educating climbers regarding Leave No Trace principles posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. Our experience is that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and

suggest alternative conduct that can ameliorate the problem. The NPS should document the extent of this impact prior to or during the implementation of this Wilderness Plan so that any proposed management solutions will be based on objective information. The NPS should also consult the resources recently developed at the American Alpine Club's Exit Strategies conference—see <http://www.americanalpineclub.org/exitstrategies>.

Education/Community Outreach

A climber outreach program is a critical component to any effective climbing management initiative. Nearly all climbers will choose to “do the right thing” if they understand the appropriate behavior and the justification for any restrictions. For example, signage educating climbers regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. For this Wilderness Plan to be successful the NPS should work with the climbing community directly to foster understanding, appreciation, respect, and a sense of ownership for the resources found at SEKI. By soliciting input from the climbing community directly on any proposed management initiative, the NPS will secure a key partner that can provide insight into specific resource issues and conditions, labor for building trails or other infrastructure, support for regulation compliance, and a good relationship with one of its significant user groups. Climbers have a long tradition of resource stewardship and support for resource protection. This tradition can be harnessed to support NPS planning, through consistent outreach, and an emphasis on education rather than law enforcement.

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We hope the above information helps the NPS identify the appropriate scope for the SEKI Wilderness Plan and clarifies ways in which the climbing community can be of assistance. Please do not hesitate to contact me if you require more information, or would like to discuss any of the points covered in this comment letter. The SSCA and Access Fund look forward to working with the NPS and any interested parties throughout the planning process for the SEKI Wilderness Plan.

Best Regards,



Torey Ivanic
Southern Sierra Climbers Association



Jason Keith
The Access Fund

¹ <http://parkplanning.nps.gov/projectHome.cfm?projectID=34639>

² http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_DirectorsOrder41_Comments_3.10.2011.pdf