



November 23, 2010

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**RE: Access Fund Comments to Angeles National Forest, Williamson Rock Critical Habitat Closure, Environmental Assessment**

Dear Mr. Vance:

The Access Fund welcomes the opportunity to comment on the Angeles National Forest Williamson Rock Critical Habitat Closure, Environmental Assessment (EA).<sup>2</sup> This NEPA process is critical to resolving the annual emergency orders issued by the Angeles National Forest (ANF) that prohibit climbing access to Williamson Rock. The Access Fund, along with our partners the Friends of Williamson Rock and Allied Climbers of San Diego, agree with respected members of the scientific community with expertise in this particular area who think that any potential impacts to endangered southern mountain yellow-legged frog (MYLF) would be easy to mitigate.<sup>3</sup> Therefore, we believe that the ANF's preferred alternative to close the area for three more years is unnecessary, and instead the ANF should implement the more reasonable Recreational Development Alternative under which facilities would be constructed to route recreational use away from MYLF Critical Biological Habitat.

It is the Access Fund's experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions. This Recreational Development Alternative is the correct management direction for Williamson Rock because it protects sensitive biological resources while allowing appropriate public access to a unique and popular recreation site.

**The Access Fund**

The Access Fund, a 501(c)(3) non-profit advocacy and conservation organization, is the nation's largest climbers' organization, representing over 2.3 million technical rock climbers and mountaineers nationwide. The Access Fund's mission is to keep climbing areas open, and

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<sup>2</sup> <http://www.fs.fed.us/r5/angeles/projects>

<sup>3</sup> For example, see <http://anuranblog.blogspot.com/2010/11/do-we-have-to-exclude-people-to-save.html>. See also <http://www.myfrog.info/naturalhistory/lifecycle.html> (citing Vredenburg, V.T., G.M. Fellers, and C. Davidson. 2005. The mountain yellow-legged frog (*Rana muscosa*). Pages 563-566 in M.J. Lanoo, editor. Status and Conservation of U.S. Amphibians. University of California Press, Berkeley, California).



to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. California is our largest membership state, and a significant number of the Access Fund's members live near the Angeles National Forest and climbed at Williamson Rock prior to its closure.

It is particularly appropriate that the Access Fund work closely with the ANF on any management decisions concerning rock climbing at Williamson Rock given the memoranda of understanding (MOU) that we have with the USFS relating to climbing management initiatives within the National Forest System.<sup>4</sup> As you know, The Access Fund has a long history of advocacy working with our affiliate organizations the Friends of Williamson Rock<sup>5</sup> and Allied Climbers of San Diego<sup>6</sup> to maintain and reopen responsible and low-impact rock climbing. The Access Fund's past comments<sup>7</sup> consistently urged the ANF to consider alternate trail approaches to Williamson Rock that would avoid endangered Mountain Yellow-Legged Frog (MYLF) habitat, and we have agreed that some climbing opportunities may have to be closed to resolve this conflict. The Access Fund also supports the comment letters submitted by the Friends of Williamson Rock and the Allied Climbers of San Diego regarding this public land access issue and which are consistent with our position.

### **Balancing Habitat Protection with Recreational Access**

Providing outdoor recreation opportunities is a stated objective in the US Forest Service's National Strategic Plan (NSP), and the Angeles National Forest Land Resource Plan requires that "conservation education, perimeter control, and management presence" be implemented before restricting public access. While the ANF's preferred three-year closure alternative is inconsistent with the NSP and ANF Forest Plan, the Recreational Development Alternative is closer to the guidance outlined in these authorities.

Obvious mitigation measures will appropriately balance MYLF habitat protection with recreational access at Williamson Rock. For example, all user-created trails could be replaced by a single maintained trail (the "Long Trail"), and any climbing routes affecting MYLF critical habitat may be closed. Also, climbers can use "wag bags" to dispose human waste and an education program by the ANF promoting Leave No Trace Practices and the specific rules

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<sup>4</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/2009%20USFS%20MOU.pdf>

<sup>5</sup> <http://williamsonrock.org>

<sup>6</sup> <http://www.alliedclimbers.org/>

<sup>7</sup> [http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CA\\_Williamson%20Scoping\\_12\\_6.5.2007.pdf](http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CA_Williamson%20Scoping_12_6.5.2007.pdf),  
<http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/Access%20Fund%20Comments%20ANF-Williamson%20Scoping%20100209.pdf>



in the planning area will ensure compliance with these measures. The climbing community is a key resource for the ANF to promote, implement, and enforce these actions.

As you know, in 2005 the Access Fund's Conservation Grants program funded a trail study by the Rocky Mountain Field Institute<sup>8</sup> to analyze access options at Williamson Rock that avoided the critical habitat of the MYLF. The ANF's Recreational Development Alternative for Williamson Rock is consistent with the findings of this trail assessment which found that once riparian areas, buffer zones, and the necessary critical habitat are determined, an alternative trail could solve the trail-wildlife conflict:

The majority of the rock is located outside the streambed corridor and several hundred feet away from where the Mountain yellow-legged frog has been located to date. In the event that a trail from [the main] parking lot is established to provide access for climbers, a stream crossing can be easily constructed to avoid any disturbance to the streambed.

The establishment of a single access trail to Williamson Rock and the closure of all other existing 'social' trails at the site would . . . reduce [direct climber interaction with] the Mountain yellow-legged frog and the Johnson's buckwheat.

Like the RMFI study, the ANF Recreational Development Alternative includes a map<sup>9</sup> indicating that a trail could be built that avoids the streambed critical to the health of the MYLF. We believe that this analysis serves as an effective guide for designing climbing access to Williamson Rock that minimizes resource impacts.

### **Recreational Development Alternative**

The Access Fund supports the Recreational Development Alternative because we believe it will accomplish the goal of allowing limited recreational access to Williamson Rock while protecting and restoring critical MYLF habitat within the upper Little Rock Creek drainage. We support the following elements in the Recreational Development Alternative:

- The development facilities along Angeles Crest Highway. A parking lot, toilet, trailhead and informational kiosk will allow climbers and hikers a place to park and a toilet to mitigate human waste issues. Importantly, parking facilities will also allow for an informational kiosk that highlights restrictions and closures at the rock itself.
- Designation and development of a single access trail to Williamson Rock to protect the quality of the visitor experience, promote human safety, and promote the recovery of species. The designation of a "Long Trail" as the single access trail to Williamson Rock

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<sup>8</sup> <http://www.rmfi.org/>

<sup>9</sup> EA at 18.



will steer climbers and hikers away from critical MYLF habitat towards the designated staging area. Signage and barriers should be strategically placed to encourage use of the trail. We also support the closure of all other “user-created” braided trails and paths along scree slopes at Williamson Rock which have historically provided access across MYLF habitat to Williamson Rock.

- Designation and development of a primary staging area. By directing climbers to a specific staging area—preferably on a hard, durable surface—potential impacts at the base of the rock beneath specific climbing routes will be minimized. The ANF should also provide an additional informational kiosk at this staging location to highlight “eco-friendly climbing principles” (plant and animal avoidance, packing out all garbage, etc.) to aid in public understanding of conservation and recovery needs for the area.
- Closure of areas on permanent and seasonal bases, as necessary, to protect the habitat and reproductive success of species. The Access Fund supports an area closure for a distance of 50 feet from centerline of Little Rock Creek for the duration of the MYLF critical habitat designation. This closure area includes all stream-based rock climbing routes (e.g. the “Stream Wall” and “London Wall”) to reduce the potential for human/frog interaction. While climbers would prefer an alternative that maintained access to the London and Stream Walls, the Access Fund appreciates the importance of stream habitat to the MYLF and agrees to the closure of these specific areas.
- The production of a Williamson Rock Area Management Plan. A management plan is critical to outline what areas are permanently closed, what areas have temporary closures (and why), where the trail and staging area are located, and a process for amending and improving management policies in the future at Williamson Rock. In order to ensure the effectiveness of management, this plan should monitor access restriction compliance, adjust access and use protocols, guide stewardship projects, and provide for biological enhancement activities to provide species recovery. As funding permits, ongoing tri-annual surveys by the USGS of the MYLF populations in the ANF and annual supplemental condition surveys should be conducted for all sensitive species in the planning area.

The Access Fund stands ready to assist the ANF in accomplishing the various elements of the Recreational Development Alternative. This effort should include the production of educational material regarding environmentally sensitive and low-impact climbing practices for the proposed staging area kiosk. We can also provide valuable assistance for drafting of a management plan. Please see the Access Fund’s recently updated “Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan”<sup>10</sup> for information on climbing trails, kiosks, staging areas and other aspects of climbing

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<sup>10</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>



management that may be applicable to Williamson Rock. See also our new online resource—[www.climbingmanagement.org](http://www.climbingmanagement.org)—which is intended to share best practices among public land managers and planners involved with climbing management.

### **Peregrine Falcon Closure**

The ANF’s EA states that Williamson Rock is home to at least one breeding pair of Peregrine falcons. The Access Fund supports the provisions in the Recreational Development Alternative related to Peregrines:<sup>11</sup>

- Construct a trail to steer “recreational use away from falcon nesting areas.”
- Development, information kiosks, signage, and physical barriers would serve to educate and contain recreational use in the vicinity of Williamson Rock.
- Seasonal closures of climbing routes, consistent with legal authority and established USFS protocols, to minimize interaction between humans and falcons. The ANF decision record should be clear that seasonal protective measures will only take place when peregrine falcons are present.
- Additional on-site management to ensure limited access within the management area.

The Access Fund regularly works with resource managers around the country to help protect natural resources in areas visited by climbers. The Access Fund and the climbing community can, and often do, help land managers in their efforts to conserve endangered or threatened species habitat. Climbers can be an effective source of help to biologists by providing volunteer help for a range of tasks. For example, climbers have helped with monitoring the presence of special status species (providing observations to resource managers on new sightings or unusual behavior), informed local climbing communities on restrictions and policies, and organized crag and trail cleanups, and construction projects.

The Access Fund’s Conservation Grant program<sup>12</sup> regularly provides funding for management initiatives that raise awareness about climber responsibilities through stewardship projects, develop or support partnerships with resource management agencies, conservation organizations, reduce climber impacts on natural and cultural resources within the climbing environment, and develop understanding and knowledge about natural and cultural resource sensitivities where the information is used to open climbing areas or mitigate climbing impacts. For recent examples of our grant awards, see [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5049579/k.7D25/Grants\\_awarded\\_by\\_state.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5049579/k.7D25/Grants_awarded_by_state.htm). Aspects of this proposed action may qualify for our conservation grants program

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<sup>11</sup> EA at 22.

<sup>12</sup> [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)



The Recreational Development Alternative resolves the longstanding multi-year closure order at Williamson Rock. As you know, such “emergency closures” must not simply be re-executed annually without a process for a permanent resolution. The Access Fund is hopeful that the ANF will finally commit the resources needed to finally resolve this multi-year public access restriction in a way that will protect MYLF habitat. Thanks for your hard work at Williamson Rock and your willingness to regularly meet with climbers. We welcome any questions or comments you might have regarding the issues raised in this letter.

Sincerely,

Jason Keith  
Access Fund Policy Director

Cc: The Honorable Diane Feinstein, US Senate  
The Honorable Barbara Boxer, US Senate  
The Honorable Howard McKeon, US House of Representatives  
The Honorable Adam Schiff, US House of Representatives  
Jody Noiron, Forest Supervisor, Angeles National Forest  
Troy Mayr, Friends of Williamson Rock  
Jeff Brown, Allied Climbers of San Diego  
Brady Robinson, Access Fund Executive Director  
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