

August 3, 2004

Southern California  
Forest Plan Revisions  
San Bernardino National Forest  
USDA Forest Service  
Content Analysis Center  
P.O. Box 22777  
Salt Lake City, UT 84122

**Re: Access Fund Comments on the Southern California Land  
Management Plan Revisions, San Bernardino National Forest**

US Forest Service Planners:

The Access Fund welcomes the opportunity to comment on the draft Southern California Land Management Plan Revision (Forest Plan Revision) for the San Bernardino National Forest (SBNF). It is particularly appropriate the Access Fund work closely with the USDA Forest Service (USFS) on any management revisions concerning rock climbing given the memoranda of understanding (MOU) that the Access Fund has with the USFS relating to any climbing management initiatives within the National Forest System.<sup>1</sup> We look forward to working with the USFS to preserve climbing opportunities and conserve the climbing environment on the SBNF.

**The Access Fund**

The Access Fund is a 501(c)3 non-profit conservation and advocacy organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climbing organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers 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,

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<sup>1</sup> See <http://accessfund.org/pdf/AF-03-MOU-USFS.pdf>.

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. A significant number of the Access Fund's members climb in Southern California and the SBNF in particular.

The Access Fund works with resource managers around the country on a variety of public lands to help protect natural resources in areas visited by climbers. 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. We are familiar with a wide range of resource concerns and appropriate mitigation responses. For more information, see [www.accessfund.org](http://www.accessfund.org).

### **Climbing on the San Bernardino National Forest**

The climbing opportunities within the SBNF—and San Jacinto Wilderness Area in particular—are of exceptional quality and historically significant to the American climbing community. Indeed, Tahquitz Rock—considered a “mini-Yosemite” to some—was one of the first climbing areas in the Western United States and played a major role in the development of US climbing techniques and equipment as far back as the 1930s. The rating system for climbing difficulty—later known as the Yosemite Decimal System—was first developed at Tahquitz, and many famous American climbers who later established ground-breaking climbs in Yosemite and elsewhere first cut their teeth at Tahquitz. American classics at Tahquitz such as *Ski Tracks*, *Open Book*, and *The Vampire* still attract climbing enthusiasts from around the country.

Importantly, the use of fixed anchors at Tahquitz is long-standing. Although there remains few new climbing routes at Tahquitz and environs in need of new fixed anchors (hence there is little need to manage new fixed anchor placements), there are nonetheless future climbing opportunities that may require these new anchors. The USFS should provide for a reasonable level of new fixed anchor placements at Tahquitz and elsewhere in the SBNF to accommodate the longstanding use of the area by climbers. In addition, some of the old existing fixed anchors within the San Jacinto Wilderness are in need of replacement to make them safer and the USFS should provide for this as well.

## Fixed Anchor Provisions In The Draft Forest Plan Revision

The Access Fund applauds the USFS for its ongoing efforts to solicit public feedback to the SBNF Forest Plan Revision. However, as written, the draft Forest Plan Revision includes some troubling language concerning the placement of new fixed anchors for climbing within the Jan Jacinto Wilderness Area. In particular, the draft SBNF Forest Plan Revision states, “No new fixed anchors for rock climbing are allowed.”<sup>2</sup> The Access Fund believes that this management prescription is unwarranted because it is (1) unnecessary, (2) would effectively unreasonably limit climbing opportunities throughout the SBNF, and (3) the USFS at the national level is nearing completion of a national standard that would provide an authorization process for the placement of new fixed anchors in wilderness areas throughout the National Forest System. Accordingly, the USFS should remove this wilderness standard from the SBNF’s draft Forest Plan Revision entirely and let the impending national standard phase-in. Alternatively, if the USFS wishes to provide specific management provisions in the SBNF Forest Plan Revision that govern the use and placement of fixed anchors, the USFS should consider providing for limited fixed anchors authorized through a permit process.<sup>3</sup>

Fixed anchors, especially bolts, are sometimes controversial. In our experience working with land managers from across the country, 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. The USFS must protect the resource, but is required only to consider (not necessarily satisfy) the philosophical priorities of interest groups. The Access Fund maintains that any decisions

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<sup>2</sup> Wilderness Standards

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SBNF S10 - No new fixed anchors for rock climbing are allowed.

<sup>3</sup> For examples of similar fixed anchor application review procedures, and climbing advisory councils, consult the following:

- Red River Gorge, Daniel Boone National Forest, KY:  
<http://www.rrgcc.org/index.php?category=Climbing+Advisory+Council>  
<http://www.rrgcc.org/index.php?category=New+Route+Application+Process>
- Joshua Tree National Park, CA:  
<http://www.friendsofjosh.org/about/>  
<http://www.friendsofjosh.org/news/news/climbingCommittee.asp>
- Eldorado Canyon State Park, CO:  
<http://parks.state.co.us/eldorado/stewardship.asp>
- Iowa State Lands, IA:  
<http://www.state.ia.us/government/dnr/commissions/nrc/summaries/junenrcminutes.htm#Final%20Rule—Chapter%2051,%20Game%20Management%20Areas>  
<http://www.geocities.com/eiowacc/main.htm>

regarding bolting should be grounded in a firm understanding of resource capacity, associated impacts, acceptable rates of change to the natural environment, and of course the specifics of the Wilderness Act when considering activities within the San Jacinto Wilderness Area.

It is the Access Fund's position that bolts are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for bolts to provide the desired climbing experience should be evaluated in relation to resource protections before any decisions are made to restrict the use of these tools. As written, the draft Forest Plan Revision for the SBNF provides no such fixed anchor evaluation to justify a prohibition.

The Access Fund supports—and the USDA Office of General Counsel agrees with—an interpretation of the Wilderness Act whereby fixed anchors are not considered “installations.” Thus, fixed anchors are legitimate tools used by climbers in wilderness areas. Furthermore, from a resource standpoint, concerns that fixed anchors will proliferate uncontrollably can be resolved simply through enforcement of the prohibition of motorized rock drills in wilderness because bolt holes are far too difficult to drill by hand, especially in the very compact granite found at Tahquitz.

The Access Fund is encouraged that a service-wide policy directive to Forest Service units will acknowledge that fixed anchors are allowed unless prohibited.<sup>4</sup> Indications are that this policy will eventually be codified into the Forest Service Manual (which, in turn, will be incorporated by reference into the SBNF Forest Plan). Please contact Don Fisher in Washington, DC for the specifics on the Service-wide efforts to establish a management regime for fixed anchors within USFS wilderness.<sup>5</sup> Also, please see

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<sup>4</sup> Some general principles that the federal Interagency Wilderness Policy Council (including the USFS Washington, DC office) considers appropriate to guide federal agencies in managing the use and placement of fixed anchors in wilderness include the following:

- Motorized rock drills, chipping and glue and epoxy of hand and foot-holds are prohibited.
- Climbers may use and remove temporary anchors without restriction, except in areas closed to climbing due to resource issues.
- Climbers may use existing permanent anchors without restriction, except in areas closed to climbing due to resource issues.
- An authorization or permit is required to replace or remove an existing permanent anchor or place a new permanent anchor. A climbing management plan could identify where their use would be appropriate or inappropriate.
- The placement of an existing permanent anchor or placement of new permanent anchor is allowed to respond to an emergency.

<sup>5</sup> Don Fisher National Forest Wilderness Program USDA Forest Service P.O. Box 96090 Washington, DC 20090-6090 (202) 205-1414 Fax: 202-205-1145 E-Mail: dfisher@fs.fed.us

enclosed copies of previous communications the Access Fund has had with the USFS's Washington-based office of Recreation, Heritage & Wilderness Resources concerning the fixed anchor in wilderness issue. These documents express some possible specific logistical concerns relating to fixed anchor permitting processes.

### **Conclusion**

As stated, The Access Fund opposes the wilderness standard in the draft Forest Plan Revision for the SBNF that prohibits the placement of new climbing fixed anchors in the San Jacinto Wilderness Area. Allowing the national standard to govern this issue will prevent conflict with the Forest Service Manual and the SBNF Forest Plan. The Access Fund encourages the USFS to consider removing the wilderness standard that prohibits new fixed anchor placement and instead allow the impending national policy governing fixed anchors in wilderness to be phased in (given that the SBNF Forest Plan revision will incorporate by reference the Forest Service Manual). Alternatively, the USFS at SBNF could itself authorize the limited placement of fixed anchors within the San Jacinto Wilderness Area.

The SBNF is a unique natural area and a climbing resource of significant importance. On behalf of the American climbing community, the Access Fund appreciates the USFS's efforts to solicit public input. However, the USFS should develop a more reasonably balanced management direction that is inclusive of public preferences and values including rockclimbing. We hope our comments will provide a meaningful contribution to both the substance and clarity of the Draft Forest Plan Revision for the SBNF regarding planning goals, objectives, and strategies.

Sincerely,

Jason Keith  
Policy Director  
The Access Fund

Enclosures

Cc:

Don Fisher, USFS Wilderness Management Specialist  
Fran Colwell, San Bernardino National Forest Recreation Officer  
Steve Matous, Access Fund Executive Director  
Shawn Tierney, Access Fund Access and Acquisition Director  
Randy Vogel, Southern California climber