



**VIA EMAIL**

- hard copy to follow

October 2, 2009

Darrell Vance  
Williamson Rock ID Team  
Angeles National Forest  
701 N. Santa Anita Avenue  
Arcadia, CA 91006-2725  
[dvance@fs.fed.us](mailto:dvance@fs.fed.us)

**Re: Access Fund Comments To Williamson Rock Temporary Closure Resolution  
Scoping Notice**

Dear Mr. Vance:

The Access Fund welcomes the opportunity to comment on the Angeles National Forest Scoping Notice: Williamson Rock Temporary Closure Resolution.<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. 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 proposed action 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 1.6 million technical rock climbers and mountaineers nationwide. 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. 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 recently executed with the USFS relating to climbing

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



management initiatives within the National Forest System.<sup>3</sup> As you know, The Access Fund has a long history of advocacy working with our affiliate organization the Friends of

Williamson Rock<sup>4</sup> to reopen responsible and low-impact rock climbing. The Access Fund's past comments<sup>5</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.

As you know, in 2005 the Access Fund's Conservation Grants program funded a trail study by the Rocky Mountain Field Institute to analyze access options at Williamson Rock that avoided the critical habitat of the MYLF. The ANF's proposed action 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 proposed action includes a map indicating that a trail could be built that avoids the streambed critical to the health of the MYLF. We believe that this analysis (attached hereto) may serve as an effective guide for designing climbing access to Williamson Rock that minimizes resource impacts.

### **Proposed Action**

The Access Fund supports the proposal outlined in the ANF's September 10, 2009 Scoping Letter and 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 ANF's proposed action:

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<sup>3</sup> <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/2009%20USFS%20MOU.pdf>

<sup>4</sup> <http://williamsonrock.org>

<sup>5</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)



- The develop facilities along Angeles Crest Highway. A parking lot 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 of a “Long Trail” as the single access trail to Williamson Rock. This trail will steer climbers and hikers away from critical MYLF habitat towards the designated staging area.
- 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. It might also be helpful to have an additional informational kiosk at this staging location.
- 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.
- Restore habitat and implement recovery actions for Mountain Yellow Legged Frog. Recovery of the MYLF is the basis for the Williamson closure and this proposed management action. Accordingly, an effective plan to ensure that the MYLF recovers appropriately—including specific habitat restoration and protection such as trout dams—must be planned for and executed by the ANF with consultation from stakeholders.

The Access Fund and the Friends of Williamson Rock stand ready to assist the Forest Service in accomplishing the various elements of the proposed action. This effort should include the development 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. Check out the Access Fund’s recently updated “Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan”<sup>6</sup> for information on climbing trails, kiosks, staging areas and other aspects of climbing management that may be applicable to Williamson Rock.

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 proposed closure of these specific areas. However, the ANF also proposes temporary raptor closures at Williamson Rock. The ANF should provide the public with more information regarding this closure. In particular:

- What species of raptors are nesting at Williamson Rock?

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<sup>6</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000789/k.F0FC/Climbing\\_Management.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000789/k.F0FC/Climbing_Management.htm)



- Is that species a federal or state listed endangered or threatened species?
- Does the ANF have data concerning where the raptors nest and when raptors were recently and historically observed nesting at Williamson Rock?
- What management guidelines is the ANF using to determine the time and scope for this temporary closure?

Answers to these questions will help to clarify the appropriate rationale for the proposed raptor closures.

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>7</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.5000943/k.8EFD/Press\\_Releases/apps/nl/newsletter2.asp](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000943/k.8EFD/Press_Releases/apps/nl/newsletter2.asp). Aspects of this proposed action may qualify for our conservation grants program

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This proposed action 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 appreciative that the ANF has committed resources to finally resolving 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.

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<sup>7</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)



Sincerely,

A handwritten signature in purple ink that reads "Jason Keith". The signature is fluid and cursive, with the first name "Jason" and the last name "Keith" clearly legible.

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  
Jody Noiron, Forest Supervisor, Angeles National Forest  
Brady Robinson, Access Fund Executive Director  
Troy Mayr, Friends of Williamson Rock  
Jim Pincter-Lucke, Access Fund California Regional Coordinator  
Randy Vogel, Esq.