

Testimony For Hearing To Examine Opportunities To Improve Access, Infrastructure, And Permitting For Outdoor Recreation (Held March 14, 2019)

For Consideration By The United States Senate Committee On Energy And Natural Resources

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Submitted by
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Chairman Murkowski, Ranking Member Manchin, and members of the Committee on Energy and Natural Resources:

The Access Fund is a national advocacy organization and accredited land trust whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 20,000 members and 120 local affiliate climbing organizations. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund holds memorandums of understanding with National Park Service, US Forest Service and Bureau of Land Management.

Please find below Access Fund's comments for opportunities to improve access, infrastructure, and permitting for outdoor recreation. These comments are limited primarily to the management of rock climbing resources on National Forest System lands.

1. US Forest Service Lacks Climbing Management Guidelines Despite Longstanding Need and Extensive Rock Climbing Use of National Forest System Lands

National-level USFS climbing management guidelines are needed for all National Forest System designations. Approximately 30% of America's climbing occurs on United States Forest Service (USFS) lands—over 10,000 discrete cliffs provide exceptional opportunities for Americans to climb in our national forests. Much of this climbing activity occurs on National Forest System lands identified a recommended wilderness or as designated wilderness. The USFS has been considering national-level climbing management guidelines at least since the agency initiated a Negotiated Rulemaking process in 1999 "to develop recommendations for a proposed rulemaking for the placement, use, and removal of fixed anchors used for recreational rock climbing purposes in congressionally designated wilderness areas administered by the Forest Service." However, that negotiated rulemaking resulted in no management prescriptions on USFS lands despite analogous policies formalized by both the National Park Service and Bureau of Land Management.

This absence of basic management guidance for climbing on National Forest System lands has led to confusion among land managers and the climbing public as to best practices for both regulating and recreating on federal lands, both in and out of designated wilderness areas. Since the negotiated rulemaking process, the USFS has drafted national-level recreation management guidelines in the agency's Forest Service Manual 2320—which seeks to provide management prescriptions for a range of recreational activities within designated wilderness areas—but the USFS has failed to issue national-level regulations for climbing despite the obvious need for such policies.

Rock climbing resources within areas recommended for wilderness are often "managed as" wilderness and therefore restrict climbing activities that do not create lasting impacts and do not affect wilderness character, such as placing or replacing existing fixed climbing anchors with a power drill (the Wilderness Act prohibits the use of any motorized equipment). The 2012 USFS Planning Rule mandates the identification and recommendation of areas appropriate for new wilderness designations, yet often USFS planners are unaware if and where climbing resources are located within their iurisdictions. The issuance of guidance to USFS managers regarding the management of recommended wilderness would prevent stakeholder conflicts and protect wilderness character without unfairly restricting activities that do not result in negative impacts. Climbing management conflicts are not restricted to one region; they are evident in every USFS district that affords climbing opportunities, resulting in unsubstantiated climbing access restrictions and climbing management strategies that don't adhere to best management practices. The USFS needs clarity on wilderness (and non-wilderness) climbing management so that climbing is managed in a consistent, sustainable manner that allows for appropriate recreation and benefits local economies.

2. The US Forest Service Needs to Better Facilitate and Authorize Volunteer Recreation Stewardship Projects

The lack of climbing management guidelines (described above), combined with a measurable increase in visitation levels at USFS climbing areas (7 million estimated climbers in America), has resulted in many USFS climbing resources in need of stewardship attention (see Appendix A). Most climbing areas were not designed to accommodate the current levels of visitation evident at many popular climbing areas in the country. These areas can be protected, restored and enhanced to provide optimal recreation experiences through erosion control, trail work, fixed anchor replacement, waste management initiatives, parking solutions and other stewardship efforts.

Non-profit organization, such as Access Fund and its Conservation Team, stand willing and able to help steward and restore America's climbing areas. However, federal land agencies need improved processes for allowing volunteer stewardship initiatives on National Forest System lands that compliment the work of the agency. Bureaucratic obstacles often prevent well-intended stewardship efforts before they can be implemented, and streamlining such projects could significantly improve resource conditions at many USFS climbing areas.

3. Local Communities and Land Managers Should Better Capitalize on the Economic Benefits of Rock Climbing

Rock climbing use and visitation benefits many local economies, especially in rural areas where studies indicate¹ that rock climbing and associated activities generate millions of dollars in economic production. For example, an economic analysis of climbing areas in the Appalachian region (see Appendix B) shows that the location of climbing resources in this geographic area closely correlates with "at-risk" and "distressed" counties as

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¹ See http://www.climbingmanagement.org/issues/economic-benefits-of-climbing

defined by the Appalachian Regional Commission. The economic benefits of climbing can help local economies by attracting visitors as well as new residents who seek to live near high-quality rock climbing resources. Currently, these benefits are largely untapped yet the opportunity to capture economic benefits for distressed and at-risk communities is growing given projections that the number of rock climbers will continue to grow as the sport's profile increases: rock climbing will be included in the 2020 Olympics and recent climbing-themed movies have earned international acclaim (e.g., *Dawn Wall* and Oscarwinning *Free Solo*). Better management, enhancement and promotion of climbing resources by USFS managers can significant assist many local communities looking to diversify their local economies.

4. The "Energy Dominance" Agenda Threatens Recreation Values

Nearly 60% of America's climbing areas are located on federal public lands, and the overlap of rock climbing landscapes with energy development and mining is substantial. Climbing resources, similar to other recreation resources, are not defined by merely the geology, but also the viewshed, airshed, soundscape, natural and cultural resources, and traditional values. Current resource extraction policies and practices by federal land managers threaten the integrity of conditions necessary for quality recreation experiences. The administration's "energy dominance" agenda has translated into shorter public comment periods for considering the impacts of energy production on recreation values and cursory analyses regarding the cumulative impacts of expanded energy development on public land recreation and related socioeconomics. These management changes have resulted in reduced economic benefits from climbing and diminished recreation experiences.

A more balanced approach to mining and oil/gas leasing that thoughtfully considers recreation resources is possible if federal agencies better understood recreation use patterns, which could be accomplished through expanded comment periods analyzing the relationship between recreation and energy development proposals. The USFS could also conduct more proactive stakeholder engagement to better understand potential conflicts before projects are initiated and recreation resources are diminished. Better integration of the recreation community in resource extraction projects could benefit land managers, recreation enthusiasts, and energy companies by avoiding multiple use conflicts that often extend administrative processes and impair recreation experiences.

5. Land Management Agencies Need Better Inventories and Monitoring of Recreation Use Patterns to Better Manage Recreation Activities

Land management agencies are not aware of the extent and location of America's 30,000 cliffs, towers, and alpine climbing objectives that define America's world class climbing resources. A lack of a comprehensive climbing resource inventory and visitor use data has resulted in missed economic opportunities, sub-optimal land management plans and unnecessary resource management conflicts.

Federal recreation resource inventories and visitor use estimates (such as the USFS's

National Visitor Use Monitoring protocol) are antiquated and do not adequately consider dispersed activities such as rock climbing. Furthermore, federal land management agencies have difficulty integrating crowd-sourced and social media data, which are increasingly common and offer an efficient solution for estimating visitor-use levels and cataloging recreation resource locations. Understanding recreation use patterns is critical for optimizing management strategies and providing accurate assessments of visitor use metrics. Better stakeholder engagement to understand recreation use patterns is key to optimizing USFS management practices.

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Thank you for the opportunity to provide testimony to the United States Senate Committee on Energy and Natural Resources hearing to examine opportunities to improve access, infrastructure, and permitting for outdoor recreation.

Erik Murdock

Access Fund Policy Director

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APPENDIX A

Access Fund – US Forest Service Climbing Resource Areas In Need of Stewardship Attention

Ten Sleep Canyon

Powder River District, Big Horn National Forest, WY

- Several hundred sport climbing routes, popular summer destination
- Extensive cliff side erosion and social trail braiding
- Limited and at-capacity parking along highway
- Human waste management and camping challenges
- Forest staff downsizing and funding cuts especially limiting action/partnership

Red River Gorge

Cumberland & London Districts, Daniel Boone National Forest, KY

- Several hundred sport & traditional climbing routes, international destination
- New route moratorium (Cumberland District) since 2004; potential for new climbing resources extensive and manageable
- Existing sites heavily impacted, in need of maintenance
- Historical cultural resource concerns, generally mitigated
- Significant climbing use contribution to local economy (2016 Economic Study)

Boulder Canyon

Boulder District, Arapaho - Roosevelt National Forest, CO

- Several hundred sport & traditional routes, quick & easy access; growing level of use, located within minutes of Colorado's Front Range
- Numerous climbing areas (access trails, staging areas) heavily impacted and eroding
- Parking conflicts with County Highway corridor

Mills Canyon (Roy)

Kiowa National Grassland, Cibola National Forest, NM

- Increasingly popular bouldering area
- Numerous access roads necessary, not currently part of official USFS system
- Expanding dispersed camping, access trails and human waste concerns
- Surrounding communities historically from dust bowl ranching era, climbing could contribute to local economy

The Fins

Lost River Ranger District, Salmon-Challis National Forest, ID

- Several hundred sport climbing routes, increasing popularity, summer destination
- Area gaining more use and media attention
- Challenging road conditions: steep and 4x4 only access
- Growing human waste concerns & limited nearby camping
- Heavy cliff side erosion & steep slopes

- Salmon-Challis NF currently beginning planning process wilderness inventory concerns
- USFS has limited knowledge of resource or concerns

Spearfish Canyon

Northern Hills Ranger District – Black Hills National Forest

- Extensive sport climbing area
- Very limited camping & human waste management
- High levels of access trail & cliff side erosion/run-off
- Limited interest by USFS staff in addressing concerns or acknowledging resource

Icicle & Tumwater Canyons

Leavenworth Ranger District – Okanogan-Wenatchee National Forest, WA

- Increasingly popular bouldering area with extensive traditional/alpine climbing
- Growing parking concerns and roadside safety
- Limited camping & human waste management concerns
- Area also popular with non-climbers
- Heavy erosion and expanding plant degradation
- USFS District has climbing ranger program, but continued delays in taking action

Rumney Rocks

Pemigewasset Ranger District - White Mountain National Forest, NH

- Most popular sport climbing destination in Northeast, several hundred routes
- One of only 2 USFS Ranger Districts with a climbing management plan
- Currently completed NEPA for extensive stewardship infrastructure initiative
- USFS, Access Fund, Local Climbing Organization partnership for 2019-2020 initiative
- AF & LCO launching fundraising campaign for AmeriCorp and AF Crew time

Little Cottonwood Canyon

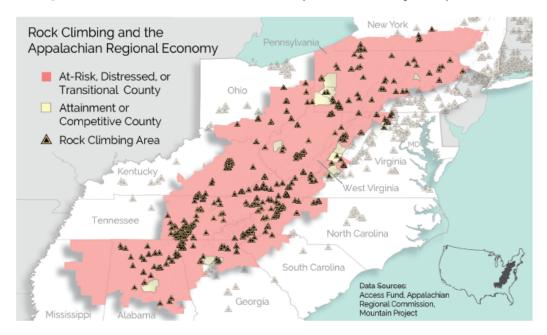
Salt Lake Ranger District - Uinta-Wasatch-Cache National Forest, UT

- Heavily impacted climbing area minutes from Salt Lake City
- USFS, AF & Salt Lake Climbers Alliance joint effort
- Success story in partnerships and climbing area stewardship work
- Several years of extensive infrastructure work completed by AF and AmeriCorps partners
- Project success lead to additional private land partnerships

APPENDIX B

Rock Climbing Can Drive Economic Development in Appalachian Communities

The Appalachian region is home to some of the best climbing areas in the United States. From Pennsylvania to Alabama, there is a rich history of rock climbing dating back to at least the 1950s. The majority of these climbing areas are located in rural, economically at-risk or distressed counties, yet only hours away from large population centers (see image below). Today, climbing is one of America's fastest growing outdoor sports. The economic benefits of rock climbing areas on Appalachian communities are well known to economists, local governments, and land managers. For example, Eastern Kentucky University economists determined that just one popular climbing area, the Red River Gorge in Kentucky, generates over 3.6 million dollars of direct and indirect economic impacts as well as new jobs (Maples et al., 2016).



While the economic impact of rock climbing is quantifiable and growing, many Appalachian climbing areas shown above are closed to public access due to antiquated regulations, liability concerns, and public access challenges. If these areas were open to the public, the Appalachian region could enjoy the measurable economic benefits that are currently ready to come to fruition. Local governments, in concert with federal funding (e.g., Appalachian Regional Commission), can facilitate the development of the Appalachian recreation economy by promoting the health and wealth benefits of rock climbing destinations.

Access Fund, alongside Outdoor Alliance and over 100 local affiliate organizations, provides local communities and land managers with the necessary tools to open, develop, manage and steward climbing areas.

Access Fund is committed to open access to Appalachian climbing opportunities and has witnessed the significant economic and social benefits from successful projects in TN. AL. NC. KY, and WV.

Access Fund is in the process of developing an Appalachian Region Rock Climbing Plan to:

- 1. Inventory climbing areas
- 2. Conduct more economic studies
- Increase outreach on the benefits of adventure tourism, and
- Assist local communities to maximize the potential of untapped climbing opportunities.