

December 12, 2013

ATTN: Forest Planning Team Susan Joyce Inyo National Forest All Units 351 Pacu Lane Suite 200 Bishop, California 93514 sejoyce@fs.fed.us

RE: Access Fund Comments on the Draft Assessment Report for the Inyo National Forest

Dear Forest Planning Team:

The Access Fund appreciates this opportunity to provide feedback on the November 2013 Inyo National Forest Draft Assessment Report. In August 2013, the Access Fund commented on the Chapter 9, 'Recreation Settings, Opportunities, and Access' Topic Paper. We appreciate that climbing, as a legitimate recreational use of Inyo National Forest, is given a slightly greater acknowledgment in the latest draft<sup>i</sup>, however several of our comments are still worthy of consideration as they have yet to be assimilated within the current version of the Assessment Report. The 2 million acres of Inyo National Forest (the Forest) provide one of our country's highest concentrations of world-class climbing opportunities, running the gamut from big-wall backcountry wilderness adventures to frontcountry bouldering test-pieces. These comments are intended to assist planners develop appropriate alternatives that enhance and protect climbing access, while sustaining the health, diversity and productivity of the Forest.

# The Access Fund

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and conserve the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land. California is one of our larger member states and many of our members regularly travel to climb at Inyo National Forest. For more information about the Access Fund, visit www.accessfund.org.

#### COMMENTS

The rock and ice climbing in the Inyo National Forest is some of the most popular and prolific of its kind in the country. The Forest contains several distinct climbing areas, ranging from worldrenowned to obscure, are located within the Forest. Each area is unique, and site specific considerations should determine the appropriate level of management. The use of such data is critical to developing an effective climbing management plan; however such climbing related data is currently not captured by the Forest Service's *National Visitor Use Monitoring* (NVUM) program. Given the lack of national protocols for NVUM related to climbing, it is important that Forest planners take extra measures to contact the climbing community to better inventory climbing activity and use patterns so that longstanding climbing access roads and trails are identified and appropriately managed and maintained. Furthermore, considering the lack of national Forest Service guidance on the use and placement of fixed anchors in wilderness, and the fact that an enormous amount of wilderness climbing occurs on the Forest, this Plan should clarify appropriate procedures for authorizing the *de minimus* use of these necessary climbing tools. The Access Fund, in consultation with local California climbers, can help planners inventory and understand climbing use patterns, local ethics, the history of each climbing area, and appropriate management policies that will protect and enhance these nationally-significant climbing opportunities.

### **Inyo National Forest Recreation Assessment**

The Bio-regional Living Assessment contends that its focus for recreation "is to provide regional context regarding recreation settings and the uses, trends and the sustainability of recreation opportunities: recreational preferences of the public, recreational access, and scenic character." Unfortunately, there is no NVUM data to support a thorough recreational assessment of climbing in the Forest. Despite the lack of data, Inyo National Forest has an abundance of excellent climbing resources and is a popular destination for bouldering, sport climbing, and alpine and big wall climbing. These forms of climbing occur in all Recreation Opportunity Spectrum (ROS) classifications within the Forest. It is evident that climbing is an integral recreational pursuit within the Forest and must be acknowledged in its comprehensive recreation assessment.

Five specific recreational resources are identified in the Living Assessment, all of which are intrinsic aspects of climbing in the Forest: 1) Recreation opportunity, 2) recreation setting, 3) sustainable recreation, 4) scenic character, and 5) recreation access are relevant to climbing resources within the Forest and important values key to high quality climbing experiences. The recreation opportunity for climbing in the Forest is vast and a important contributor to the local and regional economy, which is of particular relevance to the recreation assessment at hand. The Forest's recreation setting for climbing in general is impressively diverse, hosting climbing in wilderness, backcountry, alpine, and front country settings. Sustainable recreation is of particular value to climbers, as they have a strong impetus to protect and steward the geologic resources on which they recreate. Scenic character is a fundamental aspect of the popularity of climbing in the Forest; climbers are similarly enthralled with the Forest's natural landscape as other user groups and they visit in large part because of the Forest's impressive and unique scenic values. Finally, recreation access is essential to providing climbing opportunities in the Forest through well-

maintained trails to backcountry and frontcountry endeavors, and appropriate roads and parking areas associated with frontcountry settings.

In order to identify "landscape character goals and create the recreation settings for the public to achieve the desired recreation benefits and outcomes,"iv the Forest should recognize climbing resources within all of its Recreation Opportunity Spectrum (ROS) classifications. As stated, there are vast opportunities for climbing in the Forest and resources occur on a diverse array of recreation settings. Primitive recreation contributes to a great deal of climbing opportunities in the Forest and many climbers visit the area precisely and exclusively for this type of recreation. This includes many of the area's big wall and alpine routes that involve long, strenuous approaches in order to achieve the level of remoteness and solitude that primitive recreation offers. Semi-primitive non-motorized and motorized recreational opportunities also provide for many climbing areas in the Forest. These include less remote big wall and alpine climbs as well as single-pitch climbs that may require long, secluded approaches to access. Roaded natural areas are increasingly popular climbing destinations in the Forest due to the growing reputation of the area's quality bouldering. While many bouldering resources exist in remote areas of the backcountry, a great deal of it occurs near roaded areas that make such climbing easily accessible. Similarly, rural climbing opportunities mostly consist of bouldering and short singlepitch rope climbing near populated areas. Urban climbing opportunities are rare in the Forest, as there is little urban environment in the area.

It is evident that the Forest is host to an immensely diverse variety of climbing opportunities in an assortment of recreational settings. Climbing is prevalent in all of the Living Assessment's identified ROS classifications and should be included in the Forest Assessment if the ROS classifications are to truly benefit the public's desired benefits and outcomes. Similarly, climbing is extremely relevant to all of the recreational resources and, if properly acknowledged, will support the integrity and longevity of these resources. Climbing is both dependent upon and an asset to the Forest's natural and recreational resources.

### **Climbing Resources on the Inyo National Forest**

Below is a list of climbing areas within the Forest, organized by ranger district.

# Mono Lake Ranger District

- Lee Vining Canyon (37°57'27.00"N, 119° 7'18.84"W). Rock and ice climbing with 500' alpine granite cliffs, spires, and sport crags
- **Aeolian Buttes** (GPS currently unavailable). High 30' bouldering up glacially polished faces with pockets.
- **June Lake Bouldering** (37°46'40.80"N, 119° 4'37.20"W). Scenic, quality granite bouldering.
- Clark Canyon (37.7891°N, 118.9135°W).
- **The Stumps** (37.7758°N, 118.9647°W).
- Alpers Canvon (37.7751°N, 118.935°W).
- **Al's Garage** (37°46'32.55"N, 118°55'36.48"W). Also in the Mono Lake area, these volcanic tuff features offer sport climbing, top-roping, and bouldering.

- **Looking Wall** (37°45'19.44"N, 118°44'55.32"W). West-facing fractured granite sport climbing.
- **Matrimony Wall** (37°44′56.40″N, 118°58′33.96″W). South-facing cliff with a few good granite sport climbs.
- Chinquapin Area, Lion's Den (GPS currently unavailable). Small bouldering areas near June Lake Junction.
- Triple Cracks (GPS currently unavailable). Small volcanic bouldering area
- **Indiana Summit Natural Area** (GPS currently unavailable). High concentration of boulders and 70' volcanic crags

# Mammoth Ranger District

- **Deadman's Summit** (37.76677°N, 119.00303°W). Popular East-side bouldering off of Hwy. 395 on pocketed faces and cracks.
- Roadside Attractions and Bachar Boulders (GPS currently unavailable). Small bouldering area with 20' rhyolite boulders.
- **Granite Basin** (GPS currently unavailable). This area has year-round, world-class bouldering and alpine walls.
- **Mammoth Lakes Basin** (37°36'27.23"N, 118°57'51.50"W). This summertime crag hosts a variety of climbing on its 400' granite cliff.
- Trifle Tower, The Fault Line, Rick's Rock, The Swiss Cheese Boulder, The Tall Boys and Temple of Doom (GPS currently unavailable). These small rhyolite bouldering and top-roping areas are accessed via Hwy. 395 north of Mammoth Lakes.
- **Benton Crags** (GPS currently unavailable). High volume cliff hosts accessible year-round climbing on high desert granite.
- McCleod Lake (37°36'27.36"N, 119° 1'41.52"W), Dike Wall (37°35'46.98"N, 119° 0'50.97"W), Crystal Crag (37°35'31.20"N, 119° 0'50.76"W), Horseshoe Pile (37°36'10.80"N, 119° 1'6.96"W). Small, decent granite sport crags popular in the summer.
- **Warming Wall** (37°38'53.67"N, 119° 0'10.14"W). Popular April through November, this crag is accessible right in the town of Mammoth Lakes.

### White Mountain Ranger District

- **Sherwin Plateau** (37°34'45.84"N, 118°38'51.00"W). Small, scattered, quality boulders offering few crowds.
- Casa Diablo (37°35′7.88″N, 118°33′58.73″W). Good quality but scattered climbing with many easy and moderate routes.
- Rock Creek (37°30'34.56"N, 118°43'4.44"W), Lower Rock Creek Wall (37°30'47.88"N, 118°36'48.96"W). About 25 miles North of Bishop, this 300' granite cliff is a good beginner's area.
- Wheeler Crest (37°27'38.17"N, 118°39'8.53"W), Scheelite (Pine Creek Canyon) (37.3822°N, 118.6724°W). These granite towers are accessible approximately ten miles North of Bishop.

- **Bear Creek Spire** (37°22'8.62"N, 118°45'58.31"W). Classic High Sierra summit offers at least four excellent alpine climbs.
- **Mountain Light Wall** (37°16'54.48"N, 118°38'39.84"W). This traditional climbing cliff has a handful of good routes.
- Little Egypt (37°16'3.75"N, 118°30'34.41"W), Druid Stones (37°18'25.56"N, 118°26'11.04"W), Bridge Crags, Cardinal Pinnacle, Wild Rose Buttress, Billy's Pillar (37°16'14.73"N, 118°30'52.62"W). These granite outcroppings offer excellent rope climbing just West of Bishop.
- **Temple Crag** (37° 6'34.76"N, 118°29'33.38"W). Classic backcountry peak offers several excellent long climbs.
- Mount Humphreys (37°16′15.60″N, 118°40′39.30″W), Mount Robinson (37° 7′13.55″N, 118°30′55.34″W), North Palisade (37° 5′36.24″N, 118°30′54.28″W), Middle Palisade (37° 4′14.94″N, 118°28′2.19″W), Birch Mountain (37° 3′45.37″N, 118°25′1.61″W), Split Mountain (37° 1′27.93″N, 118°25′6.20″W).
- **The Buttermilks** (37°19'44.76"N, 118°34'37.56"W). The Buttermilks area has become one of the most popular bouldering destinations in the country, renowned for overhanging face climbing right outside of Bishop.

# Mt. Whitney Ranger District

- Mount Baxter (36°51'55.77"N, 118°21'18.87"W), Dragon Peak (36°47'19.75"N, 118°22'21.35"W), Mount Russell (36°35'21.95"N, 118°16'52.00"W), Keller Needle (36°34'36.60"N, 118°17'19.76"W). These alpine climbs vary in quality but are all soughtafter peaks in the area.
- Whitney Portal (36°35'18.73"N, 118°13'44.44"W). These thousand-foot grant routes are climbable year round.
- Mt. Whitney (36.57860°N, 118.293°W). The incredible 2,000 foot alpine granite walls up the highest point in California are some of the most renowned routes for alpinists in America.
- **Tuttle Creek** (GPS currently unavailable). Long granite cracks with beautiful Sierra scenery.
- Putterman's Rock, Cottonwood Creek, Horseshoe Launch (GPS currently unavailable). Good potential 300' granite crack climbing in the Cottonwood Lakes Trailhead area.

# **Access Fund Assistance**

Please contact us for assistance developing a climbing management plan for the wilderness and non-wilderness areas of the Forest. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* has proven to be a useful tool for land managers across the country. The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the Forest my require to provide for the world class opportunities found in the Inyo National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain climbing areas throughout the United States by

assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of climbing management for Inyo National Forest. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Best Regards,

Erik Murdock Policy Director

The Access Fund

Cc: Brady Robinson, Access Fund, Executive Director Bishop Area Climbers Coalition

http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration\_with\_federal\_agencies.htm.

<sup>&</sup>lt;sup>i</sup> Draft Assessment of Inyo National Forest, chapter 9.

ii See

iii See http://livingassessment.wikispaces.com/Chapter+9+Bio-region.

iv Id

<sup>&</sup>lt;sup>v</sup> This list is not meant to be comprehensive; as will add to our database of climbing areas we will inform Forest planners of additional locations.

vi See http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf

vii See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\_program.htm.

viii See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation Team.htm.