



September 27, 2011

Forest Plan Revision
Okanogan Valley Office
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RE: Washington Climbers Coalition, Access Fund, The Mountaineers, and American Alpine Club Comments to Proposed Action for Forest Plan Revision, Okanogan-Wenatchee National Forest

Wenatchee-Okanogan National Forest Planners:

Please accept these comments on behalf of Washington Climbers Coalition, Access Fund, The Mountaineers, and the American Alpine Club regarding the Proposed Action for the Okanogan-Wenatchee National Forest (OWNF) Plan Revision. We welcome the opportunity to comment on this project and request that you consider our comments in developing the scope of this forest plan

The **Washington Climbers Coalition** (WCC) is a non-profit, 501(c)(3) charitable organization focused on issues affecting rock climbing, ice climbing, and mountaineering in Washington. It is affiliated organization with the Access Fund. In 2004, the WCC worked with the Trust for Public Land to preserve 40 acres in Icicle Creek Canyon adjacent to the OWNF. To learn more about the WCC, visit www.washingtonclimbers.org.

The **Access Fund** is a 501(c)3 non-profit advocacy and conservation organization representing the interests of 1.4 million American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 10,000 members and affiliates. The Access Fund has a long history of interest and collaborative support in the OWNF, including sponsoring the project to build the current trail to Castle Rock (Tumwater Canyon). Washington is one our largest member states and many of our members and affiliates climb in the OWNF. To learn more about the Access Fund, see www.accessfund.org.

The Mountaineers is a 501(c) 3 non-profit whose mission is to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest. The Mountaineers was formed in 1906 to explore the wild areas and peaks surrounding the still-young city of Seattle. Today, it is home to nearly 10,000 active members who enjoy outings and courses for a range of human-powered outdoor recreation activities. To learn more about The Mountaineers, see www.mountaineers.org.

The American Alpine Club unites climbers to advance the climbing way of life. We protect the places we climb, advocate for American climbers around the world, preserve climbing's history and chronicle climbing achievement. The AAC's ongoing commitment to inspiring and supporting climbers dates back to 1902, when the country's leading climbers and conservationists banded together to form the Club. For more information, see www.americanalpineclub.org.

Climbing in the Okanogan-Wenatchee National Forest

The Okanogan-Wenatchee National Forest hosts internationally-famous alpine mountaineering and rock climbing. Climbing opportunities on the OOWNF range from bouldering and single-pitch crags to multi-pitch alpine ascents on glacial terrain. Popular and classic climbing attractions in the management area for the OOWNF Proposed Action include:

- Washington Pass¹ and Liberty Bell Mountain, featured in the classic Fifty Classic Climbs of North America, the American climbing guidebook and history written by Steve Roper and Allen Steck in 1979.
- The Methow Valley including the multi-pitch climbs on Goat Wall.²
- Alpine Lakes Wilderness
 - The Enchantment Peaks such as Prusik Peak, Dragontail, and Colchuk Peak. Due to the popularity of the Enchantments, OOWNF requires permits which are in high demand and must be applied for well in advance.
 - Mount Stuart, also a Fifty Classic Climb of North America.³
- Glacier Peak⁴ and regional backcountry mountaineering routes including the nationally-significant Ptarmigan Traverse.⁵
- Leavenworth⁶
 - Tumwater Canyon which hosts extensive bouldering and the historic training ground at Castle Rock frequented by many American climbing legends such as Fred Becky as far back as the 1930s.
 - Icicle Creek, including nationally recognized bouldering and the much visited Outer Space on Snow Creek Wall.
- Tieton River⁷ area with dozens of individual crags spread from Naches to White Pass.

Fred Beckey and Eric Bjornstad published Washington's first rock climbing guidebook, *Guide to Leavenworth Rock Climbing Areas*, in 1965. Since then numerous guidebooks⁸ have covered most of the significant climbing resources in the Okanogan-Wenatchee National Forest. Several websites also provide climbing information for the Proposed Action management area⁹ although several popular climbing crags exist with no published information. See Appendix.¹⁰

COMMENTS

We appreciate the effort of the Wenatchee-Okanogan National Forest in the Proposed Action to reflect resource and social changes, as well as new scientific information, on these nationally-significant National Forests. We provide these comments to assist the

Okanogan and Wenatchee National Forest planners identify the appropriate scope of this Forest Plan revision.

Roads and Trails

In the Proposed Action section dealing with Social Systems, the USFS states that “any National Forest System road, bridge, trail, or dock that is not needed to meet resource or social and economic objectives and/or user-created roads would be decommissioned and the landscape restored. The desired condition is to reduce miles of inventoried unauthorized roads, and minimize the development and proliferation of new unauthorized roads and trails.”

With respect to roads, we support the objective to eliminate unused and expensive parts of the OWNF’s system. However, there are currently many roads and trails used and highly valued by a variety of recreation groups and sportsmen, climbers and mountaineers included. In order to understand which roads and trails should be retained and invested in, the USFS should restart its efforts to survey and monitor the various user communities on the OWNF and better identify the diverse use patterns of these groups. This is particularly true in the Tieton River area, where many crags are accessed via USFS roads. See Appendix.

With respect to trails, many popular crags and bouldering areas in the OWNF are accessed via a user-created pathway. Most of these are unplanned, often redundant social trails that have developed through repeated traffic, rather than through unauthorized construction. Regardless, in order to access a climbing objective, climbers need to travel cross-country. The Proposed Action should recognize this reality. We support the objective of eliminating redundant and environmentally destructive social trails, but not decommissioning all user-created trail access to popular climbing areas (which we think will only widen impact). We suggest that as an objective of the Proposed Action, the OWNF work with our organizations to identify and develop a single, sustainable system of trails to service popular climbing areas similar to the Proposed Action’s direction related to River Access.¹¹ See Appendix.

Recreation and National Visitor Use Monitoring

The OWNF has no data on which to evaluate climbing use, and thus has no data upon which to plan for climbing or climbing access management. The Proposed Action states that “Through National Use Monitoring (NVUM) we know how much recreational use each Forest receives and how many people participate in the various recreational activities.”¹² The OWNF, however, had no national direction for a climbing monitoring protocol with which to measure the amount of climbing activity on the forest and thus the OWNF may be uninformed as to climbing use patterns and levels. The Forest Plan revision must adequately account for the number of rock climbers and mountaineers so that the OWNF can make informed decisions regarding climbing management and access needs. In terms of volume and variety, the Proposed Action management areas represent one of the greatest concentrations of climbing in the National Forest System, including

one of the most in-demand backcountry permitting processes for a climbing area in the Enchantment Area. We believe the number of climbing user days easily reaches into the tens-of-thousands, if not more, and climbers should be part of any strategic planning to provide for recreation on the OWNF.

Proposed Recreation Action and Use Limitations

The Proposed Action states that

The goal for recreation settings and experiences would include providing a spectrum of high quality, nature-based outdoor recreational settings where visitors access the forest, including access to the biological, scenic, cultural and experiential resources on the forest. Where the visitor's outdoor recreational experience involves few conflicts with other users, access is available for a broad range of dispersed recreation activities such as dispersed camping, rock climbing, boating ... and these experiences are offered in an environmentally sound manner, are within budget limits, and contribute to the local economy.¹³

We generally support this goal, but the OWNF should clarify why these uses are only valid if "there's no conflict with other users." Just because there may be some level of conflict among users should not affect the validity of the use; the USFS may want to segregate some uses, but any activity that is "environmentally sound" (needs a definition) should be considered valid. Also, the USFS should clarify why access would only be available for uses that contribute to the local economy. Perhaps this was not the intent of the Proposed Action language, but many otherwise valid recreational activities occur far from local communities and thus may have a negligible impact on those economies.

Adaptive Restoration

Climbers use many of the roads and access trails within the areas proposed for Active Restoration 2 and 3. As indicated above, continued access to current and future climbing areas depends on this infrastructure. See priority areas for climbing herein at Appendix for a list of roads and trails that the OWNF should incorporate into this plan revision and schedule for maintenance in future years.

Backcountry

The Proposed Action outlines a Backcountry management zone and a Backcountry Motorized zone. We support segregating motorized and non-motorized uses and the OWNF should include site specific changes to the Proposed Action to ensure that winter motorized uses are not allowed in the Backcountry zone.

Scenic Byways and the North Cascades Scenic Area

We support the Proposal to establish Scenic Byways and "Improve ten percent of the foreground and middle ground area viewed from the byway over the next 15 years to

meet desired landscape character.” However, the USFS should clarify what “improvements” would be sought and how various public uses might be affected even though there would be “no proposed changes to the current management of these areas.”

The North Cascades Scenic Area (NCSA)—which partially overlays the Liberty Bell and Sawtooth Inventoried Roadless Areas—hosts world-class climbing and mountaineering opportunities. The Liberty Bell massif and Silver Star Mountain are of particular interest to climbers, and there are dozens more high quality climbing objectives in the current NCSA zone. Over the past several years this area has been the subject of increased public debate regarding various proposals designating the area as wilderness and/or the expansion of North Cascades National Park. It seems likely that the current NCSA and associated IRAs designation is a placeholder for a subsequent designation.

The undersigned organizations support the protection of the Washington Pass area from the development of new roads and motorized transportation. However, the Washington Climbers Coalition, Access Fund, and American Alpine Club do not support the designation of the NCSA/Liberty Bell and Sawtooth IRAs as wilderness or expansion of North Cascades National Park. The view of all the undersigned organizations is that the OWNF should protect and enhance climbing opportunities at the Washington Pass area (the current Liberty Bell and Sawtooth Inventoried Roadless Areas) with one of the following designations:

- National Recreation Area (National Park Service-managed)
- Special Interest Area (US Forest Service-managed) with a climbing/mountaineering recreational purpose
- Non-motorized backcountry (US Forest Service-managed)

Special Interest Areas

We support the Proposal to establish Special Interest Areas (SIAs), in particular those focused on recreation such as Tumwater Canyon and Nason Ridge. The Proposed Action states that for SIAs

Public use allows for access, scientific study, interpretation, and education of the specified value of the area in a manner that does not threaten the values for which the individual area was established.¹⁴

Especially for recreational SIAs, the USFS should amend this statement to reinforce “recreational access” and better explain what uses are compatible for which SIAs. The OWNF should clarify how SIAs will be managed differently than other management zones. Furthermore, some existing recreational activities occur within proposed SIAs that would have a purpose other than recreation (e.g., Wildcat Wall in the proposed Wildcat Creek geological SIA). The OWNF should clarify how this new designation would affect recreation, whether management plans would be developed on a case-by-case basis, or whether there would be policies of general application used to govern the different purposes of each SIA.

As noted above, rock climbing in the OWNF is internationally-significant and forest planners should recognize this important value by designating additional key climbing locations for Special Interest Area status with a rock climbing purpose. In this way the OWNF may appropriately enhance climbing opportunities while conserving the local environment. In addition the SIAs identified in the Proposed Action,¹⁵ we suggest that the OWNF expand the areas with a rock climbing SIA designation to Icicle Creek Canyon climbing areas and portions of Snow Creek Canyon (See Appendix). Climbing classics in the region include Outer Space, Givler's Dome, the Regular Route on Careno Crag and many more climbing destinations on both the north and south side of the canyon have been popular for ten to thirty years including the very popular Pearly Gates area.

Additional climbing SIAs for consideration should include portions of the Tieton River drainage and Nason Ridge in the Wenatchee National Forest, and Liberty Bell, Early Winters Creek, and Cedar Creek in the Okanogan National Forest. We can assist in identifying these areas more specifically.

Wild and Scenic Rivers

We support the establishment of Wild and Scenic Rivers (WSR) to protect the outstandingly remarkable values of eligible and suitable rivers. Climbing and other recreational activities occur within proposed WSR management areas, designated as at least ¼ mile from either side of the riverbank. The USFS should clarify the timeline for subsequent WSR plans and how WSR management policies might affect other public uses of these areas. The Proposed Action also includes direction related to River Access, and “within 15 years, provide improved river access for boating” to specific locations.¹⁶ As indicated above, the USFS should similarly consider improving climbing access trails.

Wilderness

The undersigned organizations generally support the expansion of wilderness protection as outlined in the Proposed Action. However, because wilderness area management may bring into consideration policies regarding solitude, fixed anchors, social trails, and because climbers occasionally need the use of a power drill to established anchors for ascent and descent, there are a few small areas we request that the proposed wilderness boundary be adjusted so that high-value climbing may continue or in some cases be developed or enhanced without conflicting with wilderness regulations.¹⁷ Thus we request the following boundary adjustments in the USFS proposed wilderness recommendations:

- Naches Ranger District: Proposed Preliminary Administratively Recommended Wilderness expansion of Goat Rocks Wilderness on the north slope of Pinegrass Ridge, to the extent it includes a cliff area (the North Fork Cliff) at the approximate coordinates of 46°36'39.63"N 121°17'54.52"W to 46°36'40.13"N 121°17'41.12"W.
- Tumwater Canyon – new proposal across river from highway at Jolanda Lake found at: 47 37 36.63N, 120 43 33.58 W.
- Icicle Creek Canyon – New proposal found at: 47 31 48.02 N, 120 44 34.42 W.

We oppose the use of the “human encounter” methodology as the singular measurement by which the USFS would manage for solitude in wilderness alpine zones within the OWNF. In these areas, using human encounters to measure wilderness values is too narrow, incomplete, and potentially biased. The opportunity to climb in solitude is something that should be protected and managed for in places like the Alpine Lakes Wilderness. However, it makes little sense to apply this human encounter standard throughout OWNF wilderness when an “encounter” can be interpreted in various ways.

In alpine areas, climbing and mountaineering takes place in an environment very different from locations where hiking occurs, which is the recreational activity studied the most under the human encounter methodology. Climbing above tree-line is a much different from other forms of backcountry travel because climbers in the alpine zone can be viewed from afar, yet still not be the same kind of human encounter one would experience in a wooded backcountry area. Our primary concern is that an inflexible focus on the number of human encounters allowed in a given area may unnecessarily limit the number of climbers who have the opportunity to climb a given route or peak, but will do nothing to protect the wilderness resource.

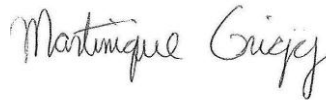
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Thank you for your time and consideration of our concerns. We look forward to working with the USFS and its partners to help develop appropriate and effective management policies for the OWNF. Please do not hesitate to contact us to further discuss our concerns.

Sincerely,



Dave Haavik
Washington Climbers Coalition



Martinique Grigg
The Mountaineers



Jason Keith
The Access Fund



Phil Powers
The American Alpine Club

Cc: Rebecca Heath, Forest Supervisor, Okanogan-Wenatchee National Forest
Kent Connaughton, Regional Forester, Region 6, Pacific Northwest Region
U.S Senator Patty Murray
U.S. Senator Maria Cantwell
U.S. Representative Doc Hastings
U.S. Representative Cathy McMorris Rodgers
The Outdoor Alliance
The Wilderness Society

APPENDIX

Climbing Area	USFS Road	Access Trail
Washington Pass		
Liberty Bell group	Blue Lake Parking Area, Hwy 20	Climber paths from Blue Lake Trail
Silver Star Mountain and Wine Spires	Hwy 20 parking	
Early Winters Creek	Hwy 20	Climber paths from Hwy 20
Mazama Area		
Goat Wall	Lost River Road	2 access trails from paved road
Robinson Creek	Hart's Pass Road	climber trail from FS Road # 5400/County 9140
Fun Rock	Lost River Road	Climber trails
Tumwater		
	Hwy 2	Several trails from Hwy 2
Castle Rock, Clem's Holler Area, February Buttress, Midnight Rock, Noontime Rock, Rattlesnake Rock, various bouldering locations, Nason Ridge	Hwy 2	
Jupiter Rock, Waterfall Column, Drury Falls	Hwy 2	Hwy 2, across the river near Jolanda Lake
Icicle Creek		
	Icicle Creek Road	Several trails from Icicle Road and Snow Creek Trail
8-mile Buttress, 8-mile Rock, Alphabet Rock, Barney's Rubble & Forest Land, Careno Crag, Clam Shell, Condor Buttress/Area 51, Domestic Dome, Duty Dome, Fish Wall, Fourth of July Rock, Givler's Dome, Icicle Buttress, J-Y Crag, Mad Meadows, Mountain Home Road, Mountaineers Dome, Pearly Gates, Playground Point, Pretty Boulders, Sam's Hill, Snow Creek Wall, Trundle Dome		
Snow Creek Wall		
Leavenworth Area		
Mission Creek	SR 207	Mission Creek Road
Punk Rock	Chumstick Road	FS road on Tumwater Peak from Chumstick

		Rd
Stuart Range	Icicle Creek Road	
Colchuck Peak Dragontail Mt. Stuart Prusik Peak	For the northern portions of the area, various trails and peaks can be accessed via Highway 2. Reference Green Trails Maps #175 and/or #176. For the western portions of the area, various trails and peaks can be accessed via the Middle Fork of the Snoqualmie River (north of North Bend, WA). Reference Green Trails Maps #174 and/or #206. For the southern portions of the area, various trails and peaks can be accessed via I-90 and Highway 903. Reference Green Trails Maps #206, #207, and/or #208. For the eastern portions of the area, various trails and peaks can be accessed via Highways 2, 97, and 970. Reference Green Trails Maps #177, #209, and/or #209S.	Various climbing access trails
Tieton Crags	Various FS Roads off Hwy 12	
The Cave	N/A (Hwy 12 access)	Climber path
Rainbow Rocks	N/A (Hwy 12 access)	Climber path
Lava Point	#1305/#344	Climber path
Wildcat Cliffs	#1306/#1362	Climber path
Goose Egg Mountain	#1200	Climber path
Pinegrass Cliffs & Boulders	#1241	Climber path
South Fork Cliff	#1204/#755	Climber path
The Icebox	#1204/#760	Climber path
Clearview Crags	#1205/#753	Climber path
North Fork Cliff	#1205	Road #762 (closed)/Climber path

¹ <http://www.mountainproject.com/v/mazama/106112166>

² <http://www.mountainproject.com/v/mazama/106112166>

³ <http://www.mountainproject.com/v/mount-stuart-and-vicinity/105996601>

⁴ <http://www.summitpost.org/glacier-peak/150318>

⁵ <http://www.summitpost.org/ptarmigan-traverse/154644>

⁶ <http://www.mountainproject.com/v/leavenworth/105790610>

⁷ <http://www.mountainproject.com/v/tieton-river/105921237>

⁸ A few examples of the many climbing guidebooks that cover areas within the Proposed Action management area include:

- Cascade Alpine Guide: Climbing and High Routes: Vols 1-3 (3rd Ed.) by Fred W. Beckey (Aug 15, 2000).
- Rock Climbing Washington, 2nd (Regional Rock Climbing Series) by Jeff Smoot (May 26, 2009).

⁹ See www.cascadeclimbers.com/, www.mountainproject.com, www.rockclimbing.com, and www.summitpopst.com.

¹⁰ Appendix lists both published and unpublished climbing crags. The listing is representative only and not exhaustive.

¹¹ Proposed Action at 76.

¹² Proposed Action at 48.

¹³ Proposed Action at 51.

¹⁴ Proposed Action at 74.

¹⁵ It is unclear whether the current recreation SIA in Tumwater Canyon has a rock climbing purpose, and the Proposed Action is unclear whether the proposed recreation SIA at Nason Ridge would include a climbing purpose.

¹⁶ Proposed Action at 76.

¹⁷ For more background on this issue for climbers, see http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_DirectorsOrder41_Comments_3.10.2011.pdf