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January 18, 2014

Jose Henriquez
Williamson Rock/PCT ID Team
Angeles National Forest
701 N. Santa Anita Ave
Arcadia, CA 91006-2725

Subject: Allied Climbers of San Diego Comments to Williamson Rock Proposed Closure

Dear Williamson Rock/PCT ID Team:

I write on behalf of the Allied Climbers of San Diego regarding the Angeles National Forest (ANF) proposed action to restore public access to Williamson Rock. Thank you for the opportunity to comment.

The Allied Climbers of San Diego

The Allied Climbers of San Diego (ACSD) is a 501(c)3 California Non-Profit Public Benefit Corporation representing rock climbers' interests in promoting responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, conservation, and minimum impact practices. ACSD represents the collective interests of thousands of Southern California climbers in working to educate parties involved in access issues that climbing resources are valuable recreational resources to the public and that climbing is a legitimate, low impact, human powered activity.

ANF Proposed Closure Resolution

The ANF's decision to undertake an Environmental Assessment (EA) is an excellent opportunity to acquire public input on restoring access for recreation and to outline mountain yellow-legged frog (MYLF) protections.

ACSD is supportive of the ANF moving forward with resolving the closure order that has been in place since 2005 at Williamson Rock. ACSD understands that the Endangered Species Act (ESA) requires protections of the MYLF and its critical habitat. We believe that public access at Williamson Rock can be restored while protecting and enhancing frog habitat at the same time. We support an action that minimizes closure areas and maximizes public access.

Our comments by section are as follows:

Implement long-term and seasonal closures

While ACSD supports the closure of MYLF habitat in the immediate streambed area, ACSD opposes any proposed long-term or seasonal closure for the MYLF that is not limited to the MYLF critical habitat in the streambed area.

Limited information has been provided to accurately describe the area proposed for permanent closure, but any closure of lands outside of the streambed is believed by ACSD to be unnecessary for protection of



the MYLF. Seasonal closure of the entire Williamson Rock climbing area is unnecessary for the protection of the MYLF. A large portion of the Williamson Rock climbing area is outside of the critical habitat for the MYLF and a significant portion of the climbing resources are well outside the streambed area. Allowing rock climbing on walls not located in the streambed areas would restore valuable recreational opportunities and would not negatively impact the MYLF.

ACSD supports the proposed soft-barrier and signage to clearly demark boundaries of MYLF critical habitat closure areas. Such installations will help ensure closure boundaries are not inadvertently crossed.

ACSD opposes a fixed seasonal closure of the Williamson Rock climbing area for raptor nesting. Seasonal nesting protections should be limited to raptor species that are State or Federal listed or otherwise afforded additional protections (Fully Protected by State or BGEPA). The Peregrine falcon was delisted from Federal protection in 1999. Please provide additional information in the EA to describe the raptor nesting at Williamson Rock, and reference legal and scientific justification for the location, size, and duration of proposed seasonal closure. If a closure is to be implemented, it should be limited in size, flexible, and based on active monitoring for nest activity. A detailed monitoring plan should be provided in the EA.

It should be noted that falcon nesting at this site began well before the current closure, when the area was very popular with climbers. Climbers simply avoided the routes closest to the nest. Peregrine falcons are documented to be quite tolerant of human disturbance and frequently nest on buildings, bridges and other man-made structures that are subject to extreme noise and close proximity to human activity. Closure sizes across the country for Peregrines vary in size but some are small, including only individual routes immediately surrounding the nest site and typically consider factors like topography and viewshed from the nest site. The individual route closures of the Colorado State Parks in Eldorado Canyon should be reviewed as a reference (<http://boulderclimbingcommunity.net/eldorado-closures/>). Based on these factors and climber experience at the nest site prior to the current closure, ACSD believes that the seasonal closure of three routes on the right-side of the Eagle's Roost Butte – "Dancing on the Storm", "F.S.T.D", and "Belly of the Beast" – would be adequate to prevent disturbance of nesting raptors.

The proposed duration and timing of the seasonal closure does not appear to coincide with literature on either the MYLF or Peregrine falcon critical breeding seasons, and would severely limit the months that rock climbing could occur. The climbing season is limited to warmer months of the year and the proposed timeline would eliminate the opportunity for recreation for all but 2 months of the climbing season.

If a seasonal closure is still planned, please provide a more detailed map of the areas to be permanently and seasonally closed to public access. Please provide justification for the proposed duration and timing of the seasonal closure.

Pacific Crest National Scenic Trail bridge

ACSD supports the proposed footbridge across Little Rock Creek. The installation will restore recreational access and minimize impact to the MYLF.



Establish limited access to Williamson Rock, while installing public amenities for resource protection

ACSD supports the establishment of a system trail to the east side of Williamson Rock from the Kratka Ridge parking lot. The closure of social trails and restoration of necessary trails will greatly benefit the Williamson rock area by focusing use into less sensitive areas, reducing trails down loose talus slopes, and reducing erosion and sedimentation into Little Rock Creek from numerous trail crossings. ACSD supports an alternate trail alignment that reduces the impact on sensitive biological resources and allows for safe public access. Climbers are interested in assisting the Forest Service with trail creation once approved.

ACSD also supports the installation of an information kiosk at the terminus of the “Long Trail” at Williamson Rock, as well as the construction of the restroom facilities proposed for the parking area and Williamson Rock Staging area.

Development of a focused access point that addresses human waste (toilet facilities), food, and other waste is a responsible solution to basic sanitation needs that had previously gone unaddressed. The creation of a central parking area and trail head with an informational kiosk is a great idea to focus use into a less sensitive area.

Rehabilitate abandoned or damaged areas

ACSD supports the rehabilitation of social trails on the “short” approach. Those routes suffer from severe erosion issues and cross critical MYLF habitat.

Develop a monitoring and adaptive management plan

ACSD supports the development of a detailed monitoring and adaptive management plan. Such a plan is critical to the success of a project like this. ACSD encourages the Forest Service to utilize volunteer groups, including rock climbers, as valuable resources to monitor the area and collect data needed to properly manage the resource.

In addition to those direct comments to the Williamson Rock project Scoping Letter, ACSD has the following comments:

Legal Concerns

It is improper to close a resource based on conclusory assertions unsupported by consulting scientists and/or scientific data. (See e.g. *Native Ecosystems Council v. Tidwell* (9th Cir. 2012) 599 F.3d 926.) The proposed seasonal closure of the *entire* Williamson Rock climbing area based on purported threat to the MYLF population is improper. The vast majority of the Williamson Rock climbing area falls well outside the critical habitat of the MYLF population. Any such closure is overbroad and will likely be deemed *arbitrary and capricious* just as in *Native Ecosystems*, supra.

Funding Concerns



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ACSD has concerns that funding issues may prevent implementation of some aspects of this plan. If all components of action cannot be implemented due to funding, what portions of the plan will still be allowed to proceed? The EA should study alternatives that scale down costs—such as removal of the bridge construction while still including the proposed action of constructing an alternate trail. Also, consider lower-cost, temporary alternatives such as “wag-bag” personal waste bags as a temporary solution to allow restoration of access in the event that toilet facility installation is delayed. A well-laid plan that cannot be implemented due to funding limitations will not serve anyone.

In Closing

When Congress handed over stewardship of the national forests to the National Forest Service, they charged the Forest Service to protect outdoor recreation *first*. According to the relevant Code of Federal Regulations: “The national forests and grasslands provide a wide variety of uses, value, products, and services that are important to many people, including *outdoor recreation*, forage, timber, wildlife and fish, biological diversity, productive soils, clean air and water, and minerals. “ [Emphasis added]. 36 CFR 219.1(b)(1). The Forest Service’s directive goes on to call for “sustainability” as the “overall goal for stewardship for National Forest land.” 36 CFR 219.1(b)(2). The CFR defines “sustainability” as embodying the principles of “multi-use and sustained-yield . . .” (36 CFR 219.1(b)(3).) If the Forest Service imposes unsupported seasonal closure of the entire Williamson Rock area, it falls short of Congress’ charge.

ACSD looks forward to reviewing the EA and supporting the ANF in implementing a solution that restores access to Williamson Rock – one of the only climbing resources available in the Angeles National Forest.

When considering how best to manage the Angeles National Forest—as Chief Forester Gifford Pinchot put it: “[for] *the greatest good of the greatest number in the long run*”—we ask that you keep climbers in mind and the value that this rock cliff holds for us and the considerable amount of our free time that we have spent exploring, enjoying, and communing with nature in this beautiful landscape.

Please do not hesitate to contact me at (858) 504-0225 should you have any questions.

Sincerely,

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