



Protect America's Climbing

November 26, 2012

ATTN: Forest Planning Team
Forest Plan Revision
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414
shoshone_forestplan@fs.fed.us

RE: Access Fund Comments on the Draft Environmental Impact Statement, Shoshone Land Management Plan Revision

Dear Forest Planning Team,

The Access Fund appreciates this opportunity to comment on the *Draft Environmental Impact Statement Shoshone Land Management Plan Revision* (Draft EIS).¹ We are encouraged that climbing is recognized as one of the important recreational uses and opportunities provided by the Shoshone National Forest² and are committed to assisting planners by providing climbing management expertise, resources, and community outreach. For more information regarding climbing resources in Shoshone National Forest and the Access Fund's positions and expertise on climbing management topics, see our scoping comments dated February 1, 2012.³

Access Fund

Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves 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—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.⁴ Wyoming is one of our larger member states and many of our members regularly travel to climb in the Shoshone National Forest. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

The Draft EIS identifies the following six major plan revision topics as the major issues addressed by the current Plan Revision: Recreation uses and opportunities; Special areas and designations; Vegetation management; Wildlife Habitat management; Oil and gas development; and, Commercial livestock grazing.⁵ These six major issues reflect the management challenges associated with Forest Service’s multi-use mandate. Six action alternatives are analyzed in the Draft EIS for the “programmatically managed of the 2.4 million acres administered by the Shoshone National Forest.”⁶ The “management approach”⁷ regarding climbing is the same for each action alternative and the Draft EIS concludes that “[p]otential influences from rock and ice climbing are not expected to be different under the action alternatives. Site-specific management and protection of nest sites will occur.”⁸ The Access Fund fully supports site-specific management, including nest protection, based on each site’s unique characteristics, the best available science, and user data.

The Access Fund manages the largest crowd-sourced list of wildlife-related climbing closures in the country.⁹ We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country.¹⁰ In many cases, climbers actively assist¹¹ by maintaining trails, removing trash,¹² and participating in the locating, monitoring, and reporting on species of concern.¹³ The Access Fund has the experience, expertise, and resources to assist planners identify and develop ice and rock climbing management plans for “priority heavy use climbing areas.”¹⁴

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*¹⁵ has proven to be a useful tool for land managers across the country.¹⁶ The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program¹⁷ or assistance from our Conservation Team¹⁸ 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 Shoshone National Forest. The Access Fund looks forward to participating throughout the entire planning process and assisting planners to develop management policy that encourages climbing while sustaining the health,

diversity and productivity of the Forest. Please keep us informed as this Plan Revision process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,



R.D. Pascoe
Policy Director
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Mark Daverin, Access Fund, Regional Coordinator
Micah Rush, Owner: 307 Bouldering & member of Casper Fire Department
Steve Bechtel, Owner: Elemental Performance + Fitness, Lander, Wyoming
Wild Iris Mountain Sports, Lander Wyoming
National Outdoor Leadership School, Lander, Wyoming

¹ See http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5379622.pdf.

² “Visitors enjoy the full range of recreational activities, including hiking, backpacking, hunting... ice and rock climbing... World-class ice climbing opportunities have been discovered on the Forest, making the Shoshone an internationally known destination for this type of recreational activity.” *Id.* at p.473.

³ See http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/WY--Draft%20Plan%20for%20Shoshone%20National%20Forest_02.01.12.pdf.

⁴ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

⁵ *Id.* at p. viii.

⁶ *Draft Environmental Impact Statement Shoshone Land Management Plan Revision Summary* at p. iii. http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5379626.pdf.

⁷ *Draft Land Management Plan Shoshone National Forest* at p. 91-92. http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5379621.pdf.

⁸ *Draft Environmental Impact Statement Shoshone Land Management Plan Revision* at p. 273.

⁹ See <http://status.accessfund.org>.

¹⁰ See www.climbingmanagement.org.

¹¹ The Access Fund sponsors approximately 130 Adopt a Crag events annually across the country. Adopt a Crag is the Access Fund’s signature stewardship program. It exists to unite local climbing communities in partnerships with land managers to conserve local climbing areas. Adopt-a-Crag events typically include activities such as litter clean-ups, trail construction and restoration, erosion control, and invasive weed removal. See <http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000889/k.166C/AdoptaCrag.htm>.

¹² In July 2011, the Access Fund launched a new Conservation Team that will spend ten (10) months a year traveling the country addressing conservation issues. *See* <http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5000939&ct=11053041>.

¹³ *Examples include:* Luther Rock, Lake Tahoe, CA; Pinnacles National Monument, CA; Eldorado Canyon State Park, CO, Jefferson County Open Space, CO; Acker Rock, OR; Trout Creek, OR; Boulder Canyon, CO.

¹⁴ “Data collection, analyses, and management plans are completed to accommodate specialized recreation uses or mitigate heavy use in an area. Examples include ice climbing management plans; rock climbing management plans for priority heavy use climbing areas.” *Draft Land Management Plan Shoshone National Forest* at p. 91-92.

¹⁵ *See* <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>.

¹⁶ *See also* www.climbingmanagement.org.

¹⁷ *See* http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

¹⁸ *See* http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.