



September 10, 2018

USDA Forest Service, Angeles National Forest
Subject: WR DEIS Comments
701 N. Santa Anita Ave
Arcadia, CA 91006-2725
Submitted via email: Angeles_SGMNM@fs.fed.us

RE: Williamson Rock/ Pacific Crest National Scenic Trail Project Draft Environmental Impact Statement

Dear Angeles National Forest and Williamson Rock Interdisciplinary Team,

The Access Fund, California Wilderness Coalition, Latino Outdoors, Southern California Mountaineers Association, Stronghold Climbing Gym, Bay Area Climbers Coalition, Sender One, Friends of Joshua Tree, REI CO-OP, and the Gear Coop, appreciate this opportunity to comment on the Williamson Rock/ Pacific Crest National Scenic Trail Project Draft Environmental Impact Statement (DEIS), which analyzes adaptive management principles to protect natural resources at Williamson Rock while providing rock climbing and other recreational opportunities and the use of the Pacific Crest Trail (PCT) where it passes the project area. The DEIS includes two action alternatives which would allow controlled rock climbing access to portions of Williamson Rock while protecting habitat for the federally listed Mountain Yellow Legged Frog (MYLF) and nesting raptors. The climbing opportunities at Williamson Rock are of exceptional quality and significance to local climbers in the Southern California region and the American climbing community.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 17,000 members and over 117 local affiliates. Access Fund holds a

national level Memorandum of Understanding with the Forest Service.¹ Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

California Wilderness Coalition

The California Wilderness Coalition (CalWild) protects and restores the state's wildest natural landscapes and watersheds on public lands. These important wild places provide clean air and water, refuges for wildlife, mitigation against the effects of climate change, and outstanding opportunities for recreation and spiritual renewal for people. CalWild is the only statewide organization dedicated solely to protecting and restoring the wild places and native biodiversity of California's public lands. CalWild was involved in the planning and management of federal public lands in the San Gabriel Mountains, including the development of the 2005 Angeles National Forest Plan and the 2018 San Gabriel Mountains National Monument Plan. We were also involved in the 2009 designation by Congress on the Angeles National Forest of the Pleasant View Ridge and Magic Mountain Wilderness areas and the 2014 establishment by President Obama of the San Gabriel Mountains National Monument.

Latino Outdoors

Latino Outdoors is a unique Latino-led organization. We are working to create a national community of leaders in conservation and outdoor education. As part of this work, we are focused on expanding and amplifying the Latino experience in the outdoors; providing greater opportunities for leadership, mentorship, professional opportunities and serving as a platform for sharing cultural connections and narratives that are often overlooked by the traditional outdoor movement. It is a space for the community to be present, share their voices, and showcase how conservation roots have been ingrained in Latino *cultura* for generations.

Southern California Mountaineers Association

The Southern California Mountaineer's Association, was founded in 1986, evolving from the rock climbing section of the Sierra Club since 1930's – making it one of the oldest climbing clubs in the nation.

The SCMA is a California Nonprofit Public Benefit Corporation formed to:

- Promote mountaineering sports, including rock, mountain, snow and ice climbing
- Promote public dialogue and a forum to exchange ideas and concerns affecting mountaineering sports
- Publicize all facets of mountaineering sports
- Provide educational services concerning access, conservation and preservation of climbing resources on public lands

¹ See <https://www.accessfund.org/uploads/Access-Fund-USFS-MOU-2014.pdf>

The Stronghold Climbing Gym

The Stronghold Climbing Gym serves the diverse and vibrant East Los Angeles area. We are located in Lincoln Heights, just outside of Downtown, and are a gathering place for climbers young and old to gain skills, train, and develop a love for Southern California's outdoors.

Bay Area Climbers Coalition

The Bay Area Climbers Coalition is a volunteer run 501(c)(3) non-profit organization focused on preserving access to our local outdoor areas by actively fostering positive relationships with land managers, hosting stewardship events, and providing educational programming for the climbing community throughout the Bay Area.

Sender One

Sender One's purpose is to discover ourselves and connect with others. We commit ourselves to offering an inspiring climbing, yoga, and fitness experience; an opportunity for self-discovery, and a sharing, social atmosphere for every customer, partner, and guest who walks through our doors (or who we meet outside of our doors). We operate the largest and tallest indoor rock climbing facilities in Los Angeles and Orange County.

Friends of Joshua Tree

Friends of Joshua Tree is a non-profit organization dedicated, to preserving the historical tradition of climbing in Joshua Tree National Park. Friends of Joshua Tree advocates, communicates, and encourages ethical and environmentally sound climbing practices, and works to shape park policy on climbing and climbing-related issues. Toward that end, Friends of Joshua Tree acts as the liaison between the climbing community and the National Park service. Visit <http://www.friendsofjosh.org/>

REI CO-OP

Recreational Equipment, Inc., commonly known as REI, is an American retail and outdoor recreation services corporation. It is organized as a consumers' co-operative. REI sells sporting goods, camping gear, travel equipment, and clothing.

Gear Coop

For nine years, Gear Coop has been at the intersection of outdoors and innovation, outfitting a new generation of outdoor adventurer. From Reel Rock screenings of over 900 climbers to sharing customer stories online, we aspire to build an enduring and sustainable outdoor community through our events, web presence and business initiatives. #ThriveOutside a proud member of the Grassroots Outdoor Alliance.

COMMENTS

Williamson Rock offers world class opportunities for rock climbing and was a premier sport climbing destination for Southern California, until it was closed in 2005. Climbers from California and around the world historically enjoyed Williamson Rock's mild summer temperatures, proximity to Southern California's urban centers, and excellent rock quality since the 1960s. Williamson Rock is within the San Gabriel Mountains National Monument (the Monument) which provides the Los Angeles County community with outstanding opportunities for close-to-home, active outdoor recreation for the more than 15 million people who live within a 90-minute drive of the Angeles National Forest -- including underrepresented populations historically limited in their access to outdoor recreation opportunities. The opportunities in the Monument offer a broad range of experiences, from highly accessible day trips for walking and picnicking to a full range of the more adventurous experiences, including technical rock climbing, prized by many of our members. Angeles National Forest (ANF) efforts to draft the DEIS in consideration of reopening Williamson Rock are greatly appreciated. We encourage ANF to complete the NEPA process and release the Final EIS by the end of 2018 to ensure the process continues to steadily move forward to limit unnecessary restrictions to the American public.

We conditionally support Alternative 3: Proposed Action (Adaptive Management) which would allow seasonal recreational use at Williamson Rock and implement adaptive management strategies to protect the MYLF and their habitat. Below are detailed comments on Alternative 3 that we believe will further enhance visitor experience at Williamson Rock and continue to protect the federally listed MYLF, Peregrine falcons and other sensitive resources in the project area.

Point System

The proposed point system for the adaptive management strategy is not in alignment with standard recreation management practices on Federal lands.² We do not support the use of a point system to document and quantify user behavior at Williamson Rock. The point system could easily be manipulated resulting in unnecessary closures, or climbing access could be subjected to further restrictions due to the activities of other user groups. Importantly, based on scientific review,³ the majority of the conditions listed that merit point deductions show no direct correlation to the health and protection of the Mountain Yellow Legged Frog. The ANF will have onsite monitors during the open climbing season making a point system unnecessary and redundant. In addition, the local climbing community is ready and willing to partner with the

² Marion, J. 2016. A review and synthesis of recreation ecology research supporting carrying capacity and visitor use management decision making. *Journal of Forestry*. <http://dx.doi.org/10.5849/jof.15-062>

³ University of California Sierra Nevada Aquatic Research Laboratory, Ronald Knapp, Research Biologist, 2010 Comment letter on Williamson Rock Environmental Assessment

ANF to ensure ongoing stewardship of Williamson Rock and associated facilities as well as assist in educating climbers on proper Leave No Trace principles and practices.⁴

Raptor Monitoring and Management

The Access Fund supports science-based raptor regulations and seasonal closures and therefore does not endorse a fixed (November 16 – July 31) closure for raptor nesting/breeding and seasonal road closures. Currently the plan proposes, “*During the first two years, public access would only be allowed during the proposed open season, while sufficient nesting data is gathered in order to determine if the open season can be adjusted*”.⁵ We suggest adaptive and flexible monitoring be implemented immediately. We support closure areas based on thorough viewshed analysis of the nest location, ensuring a minimal yet effective size closure for protecting nesting raptors.

Nationwide, many successful raptor regulations are based on site monitoring and cliff attributes, and are therefore flexible in terms of both temporal and spatial extent. Cliff and nest monitoring should inform a flexible regulatory tool instead of relying on a fixed closure that will result in unnecessary restrictions to national forest visitors. The Access Fund has compiled a database of scientific raptor studies and examples of successful and flexible restriction systems. We also produce educational material for climbers⁶ in consultation with biologists and land managers. We invite ANF to review the literature base⁷ and examples of flexible, site specific raptor protection strategies in order to help determine the best fit for Williamson Rock.

Generally, a successful raptor protection program relies on more frequent nest monitoring than the proposed two times during the nesting season.⁸ A volunteer citizen monitoring program could be implemented to assist ANF in achieving a more frequent monitoring schedule. Successful volunteer raptor monitoring programs are currently in place in other popular climbing areas across the country.⁹ The Access Fund and local climbing community are willing to assist in developing and implementing a volunteer monitoring program to assist the ANF in regular monitoring during the nesting season. A volunteer program would foster good will between the climbing community and the ANF, assist the ANF in monitoring efforts and support a modern adaptive management plan to ensure rock climbing access is open as soon as the raptor chicks have successfully fledged or alternatively if the nest is unproductive that season.

The DEIS states, “*If two years of monitoring indicates that raptors are not nesting at Williamson Rock, public access could be allowed as early as June 30th.*”¹⁰ If raptors are not nesting at Williamson Rock, we request that Williamson Rock be open. The proposal provides no scientific reason for opening access on June 30th in the absence of nesting raptors. Climbing access should

⁴ <https://Int.org/learn/7-principles>

⁵ https://www.fs.usda.gov/nfs/11558/www/nepa/97680_FSPLT3_4395482.pdf

⁶ <https://www.accessfund.org/open-gate-blog/its-nesting-season-give-raptors-space>

⁷ https://www.swocc.rocks/wp-content/uploads/2018/06/OutdoorRec-and-Raptors_DRAFT_6.20.2018.pdf

⁸ https://www.fs.usda.gov/nfs/11558/www/nepa/97680_FSPLT3_4395482.pdf

⁹ <https://www.jeffco.us/DocumentCenter/View/9972/2018-Natural-Resources-Brochure?bidId=>

¹⁰ https://www.fs.usda.gov/nfs/11558/www/nepa/97680_FSPLT3_4395482.pdf

only be limited or restricted for specific and well documented biological and cultural protection purposes.

Mountain Yellow Legged Frog

Critical Habitat for the MYLF in Little Rock Creek was proposed on September 13, 2005 and officially designated by USFWS on September 14, 2006.¹¹ No scientific evidence or studies have been conducted in Little Rock Creek correlating recreational activities, such as rock climbing, to population decline of the MYLF at Williamson Rock. However the, “*Installation of a fish barrier and nonnative trout removal from Little Rock Creek corresponded to a substantial population increase at this location...*”¹² Access Fund recommends a site specific plan be developed for expanding MYLF habitat in Little Rock Creek, including installing additional fish barriers -- proven methods for increasing MYLF populations. Despite the lack of empirical evidence, we support the closure of existing climbing routes, including London Wall and Stream Wall, that start in the Little Rock streambed and might impact MYLF habitat. The closure of climbing routes that start in the streambed, combined with proper waste management strategies and the installation of bridges on the Long Trail will effectively negate recreational impacts to the MYLF in Little Rock Creek.

Fees and Access

Williamson Rock is a very important recreational climbing resource to the diverse climbing community in the Los Angeles region. San Gabriel Mountains provide the Los Angeles community with outstanding opportunities for close-to-home, active, human-powered outdoor recreation for the more than 15 million people who live within a 90-minute drive of the Angeles National Forest—including populations historically limited in their access to outdoor recreation opportunities. Permit fees associated with accessing Williamson Rock for climbing should be free, requiring permit applicants to only pay the administrative fee for using [recreation.gov](https://www.recreation.gov). Excessively high permit fees will limit underrepresented communities ability to rock climb at Williamson Rock. The climbing community is ready and eager to partner with the Angeles National Forest to raise funds for Williamson Rock trails, vault toilets, educational signage, bridges, wag bags and staff time.

Road Closure

The set road closure date of November 15th of each year should be adaptively managed and road closures should only occur in the event of snowfall in the area. The fixed closure starting November 15th is clearly unnecessary and establishes needless restrictions on the American public. Access Fund strongly opposes the fixed November 15th road closure.

¹¹ https://www.fs.usda.gov/nfs/11558/www/nepa/97680_FSPLT3_4395482.pdf.

¹² *Ibid.*

Traditional Cultural Property

Williamson Rock has been identified as a cultural resource and a potential Traditional Cultural Property due to historic climbing activities; reopening this site to rock climbing would enhance and further establish the cultural value of this resource. Access Fund urges ANF to pursue additional studies to designate rock climbing at Williamson Rock as a Traditional Cultural Property.

Pacific Crest Trail

Access Fund supports restoring the Pacific Crest Trail (PCT) back to its historic path. However, we encourage the ANF to include adaptive management strategies for the PCT which are separate and distinct from management of the rock climbing area at Williamson Rock. The traditional PCT alignment crosses the Little Rock Creek stream corridor within the MYLF Critical Habitat. The DEIS currently allows the PCT through the project area to remain open year round with very few limits, restrictions or adaptive management strategies. Currently the level of management and restriction on allowing year round access on the PCT is limited to “*..signs would direct users to stay on the trail, and a bridge with railings would be constructed over Little Rock Creek to keep users out of the streambed*”.¹³ From the maps provided it appears that the traditional PCT may cross through Critical Habitat in more than one spot within the Little Rock Creek project area, we would like to ensure if that is the case, the same restrictions (ie signs, bridges and railings to keep users out of the streambed) would be implemented throughout the project area to ensure the Critical habitat is being protected from impacts of PCT hikers and other recreational users. We would like to ensure that the climbing access in the project area is not impacted by any potential negative impacts from the PCT being open year round and relatively unrestricted compared to climbing access in the same area.

Fixed Anchors

The DEIS states, "*The permanent installation of new fixed anchors at Williamson Rock under any of the alternatives would require prior Forest Service authorization, in accordance with 36 CFR Ch. 2, Section 261.9.*"¹⁴ In order to avoid resource management conflict and confusion, the DEIS needs to clarify the exact criteria that would be evaluated during the proposed fixed anchor authorization process, the evaluation body, and the evaluation time frame. New climbing route locations should be efficiently assessed for MYLF habitat, cultural resources and raptor nesting sites by USFS resource specialists. If a new climbing route location is deemed free of natural and cultural resource conflicts, it should qualify as appropriate for new climbing route development. The evaluation process should take no longer than one month from the time a new climbing route is proposed to the final decision.

Fixed anchors necessitate long-term maintenance. Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are

¹³ https://www.fs.usda.gov/nfs/11558/www/nepa/97680_FSPLT3_4395482.pdf

¹⁴ Ibid.

untrustworthy and need replacement much more frequently. Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts. Fixed anchor policies must provide provisions to allow climbers to maintain and replace existing anchors as necessary. For more information of fixed anchor technology and best practices visit: <https://www.accessfund.org/our-causes/replace-aging-bolts>. Access Fund and the local climbing community are ready and willing to assist in developing a fixed anchor policy for Williamson Rock.

Climbing Community Assistance

Access Fund, CalWild, Latino Outdoors, Southern California Mountaineers Association, Stronghold Climbing Gym, Bay Area Climbers Coalition, Sender One, Friends of Joshua Tree, Gear Coop, and REI CO-OP and the local climbing community are ready, willing, and able to help the ANF improve trails, build bridges, facilities, signage and support other management needs. Local climbing communities throughout California have a long history of environmental stewardship and collaboration with government agencies, private landowners, and other organizations to protect highly-valued climbing resources. Access Fund strives to work with local climbers and land managers to address those needs. We also provide training on planning and stewardship best practices to keep those areas healthy. Access Fund continues to advocate for greater funding levels for federal land agencies so that enhanced education, enforcement, and stewardship can reduce recreational user impacts on public lands. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program¹⁵ or assistance from our Conservation Team¹⁶ which helps maintain climbing areas throughout the United States.

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¹⁵ <https://www.accessfund.org/take-action/apply-for-a-grant>.

¹⁶ <https://www.accessfund.org/meet-the-access-fund/our-approach/stewardship-conservation>.

Thank you for your consideration of these comments on the Williamson Rock/ Pacific Crest National Scenic Trail Project Draft Environmental Impact Statement. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health and integrity of the National Forest. The Access Fund, CalWild, Latino Outdoors, Southern California Mountaineers Association, Stronghold Climbing Gym, Bay Area Climbers Coalition, Sender One, Friends of Joshua Tree, Gear Coop and REI CO-OP look forward to continuing to work with Angeles National Forest. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303) 552-2843) or email (katie@accessfund.org) to discuss this matter further.

Sincerely,



Katie Goodwin, California Regional Director- Access Fund



Basil Newburn, President- Bay Area Climbers Coalition



Katheren Mullen, Co-Owner- Stonghold Climbing Gym



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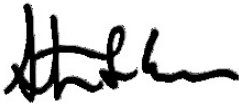
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