



18 November 2005

Carol Whetsell
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Re: Access Fund Comments to Proposed Monongahela National Forest Land and Resource Management Plan (Forest Plan) and Draft Environmental Impact Statement (EIS)

Dear Ms. Whetsell,

The Access Fund welcomes the opportunity to comment on the proposed Monongahela National Forest Land and Resource Management Plan (Forest Plan) and Draft Environmental impact Statement (EIS), and applauds your efforts to involve public participation in the process. It is particularly appropriate the Access Fund work closely with the USDA Forest Service (USFS) on any management revisions concerning rock climbing given the memoranda of understanding (MOU) that the Access Fund has with the USFS relating to any climbing management initiatives within the National Forest System.^[1] We look forward to working with the USFS to preserve climbing opportunities and conserve the climbing environment in the Monongahela National Forest (MNF).

The Access Fund

The Access Fund, a 501(c)(3) non-profit advocacy and conservation organization, is the nation's largest climbers' organization, representing over 1.6 million technical rock climbers and mountaineers nationwide. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works cooperatively with public land managers on conservation projects and management planning, supports local climbing organizations, provides funding for conservation projects and scientific studies, develops and distributes educational materials, represents the interests of climbers on public policy issues, acquires and manages land, and annually sponsors over 100 Adopt-a-Crags across the country. A significant number of the Access Fund's members climb in West Virginia and in particular in the MNF.

^[1] See <http://accessfund.org/pdf/AF-03-MOU-USFS.pdf>.

The Access Fund works with resource managers around the country on a variety of public lands to help protect natural resources in areas visited by climbers. It is the Access Fund's experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions. We are familiar with a wide range of resource concerns and appropriate mitigation responses.

I. CLIMBING IN THE MONONGAHELA NATIONAL FOREST

The climbing opportunities within the MNF are of exceptional quality and historically significant to the American climbing community. Indeed, Seneca Rocks has a long and colorful climbing history. It is conjectured that a surveyor named Bittenger carved his name on the summit in 1908, and documented climbing history dates back to 1939, when Paul Brant, Don Hubbard, and Sam Moore stood on the summit of the South Peak 900 feet above the valley floor, reputed to be one of the tallest technical ascents on the east coast at the time.

Climbers from West Virginia, Washington DC, Ohio, Pennsylvania, and Virginia continue to enjoy recreational climbing on MNF's soaring Tuscarora quartzite crags. Today, Seneca Rocks for example, once home to some of most difficult rock climbs on the East Coast, is famous for moderate multi-pitch traditional routes as well as being the WWII training ground for the Army's 10th Mountain Division. A host of the early climbing pioneers cut their teeth climbing in the MNF. Drawn by the challenge, the remote setting and the superb quality of routes and stone, successive generations of great climbers have passed through this unique area.

II. GENERAL COMMENTS

Purpose and Need for Proposed Action in MNF

We applaud the Proposed Plan's shift in emphasis from "production of goods and services tied to the accomplishment of multiple-use objectives" of the 1986 Forest Plan to a focus on restoration or maintenance of vegetation and watershed conditions. In addition, the Access Fund agrees wholeheartedly with the MNF's management philosophy that "public land in the Appalachians is scarce and precious . . . the Monongahela National Forest will become increasingly rare and valuable as a place of ecological, historic, cultural, and economic importance in the region." We would like to add specifically that the MNF has and will always be a place of recreational importance due to its unique character, remoteness in the highly-populated East Coast, and because the MNF provides over 50% of the public lands outdoor recreation opportunities and over 90% of the backcountry recreation settings in the state of West Virginia. Preserving Monongahela's wilderness character and world-class recreation should be woven into the alternatives proposed into the Forest Plan revision.

It is of some concern to the Access Fund, however, that one of the final major Need for Change topics is Backcountry Recreation, but that this immediacy is not necessarily reflected in the corresponding goal of the Proposed Action- “contribute to the economic and social needs of people, cultures and communities”- which fails to specify recreation, and particularly backcountry, wilderness recreational needs. Because climbing in the Monongahela Forest is so special – and the AF believes it important to preserve all types of climbing experience including wilderness climbing – the USFS must take whatever measures are necessary to avoid altering the natural environment and, when possible, conserve wilderness characteristics in the MNF.

Rock Climbing

The importance of climbing and opportunities to climb in the state of West Virginia can be witnessed in the state’s motto, “Mountaineers are always free.” You correctly state in the introduction to Recreation and Wilderness that the “freedom of the mountaineers is represented by the unconfined, unrestricted recreational opportunities available on the Forest.” We are pleased that under all alternatives in the Draft EIS and Forest Plan, it appears that climbing in the MNF would continue to remain open to the public, and that the Spruce Knob-Seneca Rocks National Recreation Area has a separate management plan that specifically addresses its importance as a recreational resource. Our focus of these comments, therefore, is with preserving the pristine climbing experience that is accompanied by vast and remote wilderness.

In addition, we agree with your assessment that “all acres of backcountry areas are not used the same” (3-386), and would like to add that all backcountry and, for that matter, climbing resources, are unique. It is our position that the analysis and determination of backcountry recreational opportunities should include not only the number of acres Designated Wilderness (MPs 5.0), Recommended Wilderness (MPs 5.1), Backcountry Recreation (MPs 6.2), but also the protection of the uniqueness of the areas and the need for “freedom” of discovery and exploration.

III. SPECIFIC COMMENTS

The discussion among the user community regarding conservation of public lands is fairly unanimous. Most non-motorized recreationists realize the priceless importance of maintaining a wilderness area when one exists. Therefore, Alternatives 1 and 4 of the Forest Plan and Draft EIS with zero acres designated as Recommended Wilderness (MP 5.1) are bad management choices, while ***Alternative 3 is the Access Fund’s preferred alternative*** as it is the most forward-looking alternative that provides a vision for the future in terms of managing this unique area. The changes suggested in Draft Plan Preferred Alternative 2, while moving in the direction of addressing the identified Need for Change of the current Forest Plan, do offer enough permanent protection of the rare and special federal public lands within the Monongahela Forest to meet Backcountry Recreation’s status as a Major Need for Change Issue.

The comments provided below demonstrate why Alternative 2 would provide poor direction for MNF's future, whereas Alternative 3 represents the best alternative in the Draft Plan for managing backcountry recreation in the Monongahela Forest.

A. ALTERNATIVE 2

The most significant problem with Alternative 2 is that it would likely result in an overall gradual decline in the quality and health of natural resources in the Monongahela Forest. Remote and unscathed land is being developed around the country. Especially in an area as population-dense as the East Coast, the MNF is a rarity in its pristine nature and backcountry recreation opportunities. The Access Fund and the local community are concerned that provisions in Alternative 2, affect the surrounding area and view shed, and will have a negative impact on climbing, and other recreational, experiences.

In addition, the changes in Backcountry Recreation and Designated Wilderness are not adjusted enough to address the importance of Backcountry Recreation as identified as a Major Need to Change that initiated the Forest Plan revision in the first place. Moreover, under Alternative 2 "recreation uses and *opportunities* stay much the same" and "represent little change or maintain the status quo relative to the No Action Alternative" (S-23). Alternative 2 prioritizes the major Need for Change topics and situates Backcountry Recreation lowest by emphasizing Timber Supply over Backcountry Recreation at a 70:30 ratio. We feel this is inconsistent with the findings of the Revision Team and the importance of recreation to the Forest Plan. Choosing Alternative 2 *as currently written* would disregard public ideas, feedback, and information on the importance of wilderness and backcountry recreation.

B. ALTERNATIVE 3

The better approach for managing the Monongahela Forest is outlined the Draft Plan's Alternative 3. This management direction offers a vision for maintaining and expanding the special character of the Monongahela environment. Alternative 3 would result in an overall improvement of the quality and quantity of recreational resources and retain the outstanding primitive camping resources and backcountry experiences found throughout the Forest.

Alternative 3 would better and more equally balance the 4 major Need for Change topics. It would protect current backcountry areas while still allow for timber supply and wildlife management on over half of the Forest acres. Some of West Virginia's finest wild areas would be permanently protected through a recommended Wilderness designation, including Big Draft, Seneca Creek, Spice Run, and Turkey Mountain. Additionally, Alternative 3 would place equally unique and special lands into MP 6.2 Backcountry Recreation. These designations would provide a more balanced approach for managing the Monongahela Forest in which the Timber Supply and Backcountry Recreation ratio would be an equal 50:50.

Conclusion

The MNF is a unique natural area and a climbing resource of significant importance. On behalf of the American climbing community, the Access Fund appreciates the USFS's efforts to solicit public input. However, the USFS should develop a more reasonably balanced management direction that is inclusive of public preferences, and identified Need for Change topics than is currently represented in Alternative 2. We hope our comments will provide a meaningful contribution to both the substance and clarity of the Draft Forest Plan for the MNF regarding planning goals, objectives, and strategies.

Thank you for opportunity to provide input and please do not hesitate to call me at 303.545.6772x112 with any questions on the Access Fund's position regarding the Forest Plan.

Respectfully Yours,

Deanne Buck
Programs Director
The Access Fund

Cc: Steve Matous, Access Fund Executive Director (via email)
Jason Keith, Access Fund Policy Director (via email)
Jan Kiger, West Virginia climber and Owner of Adventure's Edge (via email)
Gene Kistler, Access Fund Regional Coordinator (via email)