











December 11, 2017

Ottawa National Forest Ontonagon Ranger District 1209 Rockland Road Ontonagon, MI 49953

Attn: Susanne M. Adams

Submitted via email: eastern-ottawa@fs.fed.us

RE: Access Fund and UPCC Comments on Ottawa National Forest Silver Mountain Recreation Site Improvement Project

Dear Planning Team,

The Access Fund, Upper Peninsula Climbers Coalition (UPCC), Michigan Technological University (MTURR) Ridge Roamers, Northern Michigan University (NMU), South Superior Climbing Club (SSCC), Northland College Climbing Club (NCCC), Marquette Climbers Coop (MCC), and Down Wind Sports (DWS) of Houghton and Marquette, appreciate this opportunity to comment on the Ottawa National Forest Silver Mountain Recreation Site Improvement Project. Silver Mountain is a premier rock climbing destination for climbers in Michigan and neighboring states. These comments are intended to assist planners in the development of an appropriate management plan to enhance and protect climbing access, while maintaining the character of the National Forest.

Access Fund

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing

organization with over 15,000 members and over 117 affiliates. The Access Fund currently holds memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service¹ to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit https://www.accessfund.org/.

Upper Peninsula Climbers Coalition

The UPCC is a nonprofit advocacy group (#45-5123985) dedicated to creating and preserving sustainable and responsible rock and ice climbing in Marquette County and the surrounding areas of Michigan's Upper Peninsula.

MTU Ridge Roamers (MTURR)

The Ridge Roamers is Michigan Technological University's climbing club. Our club's intent is to involve both students and community members in the sport of climbing and to spread knowledge about safety and proper ethics associated with climbing. The Ridge Roamer's facilities include a 30-foot climbing wall and a bouldering wall in Michigan Tech's Student Development Center, as well as equipment for rock and ice climbing available for use by club members.

NMU South Superior Climbers Club (SSCC)

The South Superior Climbing Club educates students on the fundamentals of climbing by performing safety, educational, conservation-based, and enriching experiences for the Marquette County climbing community. We are centered on the ethics and responsibility as climbers in our community. Altogether, we aim to maintain current and support the development of climbing areas throughout the UP.

Marquette Climbers Co-Op (MCC)

The Marquette Climbers' Co-Op was established in 2012 to create a living and community space for local climbers. Located in Marquette, Michigan near the shores of Lake Superior, the cooperative explores new ways to incorporate sustainable living practices into the daily lives of residents and community members. The house features a bouldering wall and greenhouse for community use.

Down Wind Sports (DWS)

Down Wind Sports is an outdoor specialty retailer operating two store fronts in Marquette and Houghton Michigan. This family-owned and operated business is the only retailer selling climbing equipment in the Upper Peninsula. We pride ourselves in being involved in many aspects of climbing culture in the U.P. including education, instruction, history, crag preservation, and socials.

¹http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration with federal agencies.htm.

COMMENTS

Silver Mountain offers high quality rock climbing routes and is a treasured recreational resource in the Upper Peninsula. The Access Fund and the UPCC appreciate the Ontonagon District's efforts to develop long term management solutions for sustainable recreational and rock climbing access to Silver Mountain.

Each climbing area within the Forest is unique, and site-specific considerations should determine the appropriate level of management. Because the Forest Service does not have a complete picture of the climbing at Silver Mountain and associated use patterns, it is important that the Access Fund, in conjunction with the UPCC, inform the Forest Service (e.g., through participation in this Forest review process) on the climbing resources at Silver Mountain, so that longstanding climbing areas and potential new climbing areas can be identified and appropriately managed and maintained.

These comments are intended to assist the Forest Service to ensure that climbing access is protected and appropriate management prescriptions and designations will both maintain the health of the forest and enhance significant climbing opportunities.

Existing Climbing

Climbing routes at Silver Mountain require the use of fixed anchors. Fixed anchors are defined by the Access Fund and the USDA Forest Service as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, and are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor. Fixed anchors, specifically bolts, necessitate long-term maintenance.² All current fixed anchors at Silver Mountain are modern 3/8 by 3 inch stainless steel construction, this type of fixed anchor may last 50 years with relatively low levels of maintenance depending on environmental factors and rock type in the region.³

New Route Potential

Silver Mountain is a premier climbing destination for the Upper Peninsula and for the Midwest due primarily to its fixed anchors on routes that cater to beginner and intermediate climbers. Current route development is mostly complete, there is potential for approximately a half dozen more routes east of existing routes.

Recommendations

As part of this evaluation and planning process, the UPCC and the Access Fund recommend a plan for human waste management, trail management and signage at Silver Mountain.

² https://www.accessfund.org/learn/for-advocates/managing-fixed-anchors

³ https://www.accessfund.org/open-gate-blog/which-bolt-is-best

Silver Mountain is a popular destination for hikers and climbers and is expected to continue to increase in popularity. The MTURR, SSCC and NCCC climbing clubs are very active user groups that visit Silver Mountain most weekends Spring through Fall. Due to recent mainstream media exposure and the continued growth in indoor climbing, large numbers of climbers are moving from the gym to outdoor climbing areas. Possible solutions are installation of a WAG Bag station or a pit toilet at the parking area to reduce human waste impacts.

We suggest the installation of additional signage at the top of the cliff to warn of active climbers below. The UPCC and the Access Fund approve of the proposed trail alignment outlined in the scoping document.⁴ We suggest any paths off the main trail used to access the climbing area be marked as technical climbing access paths to deter hikers from approaching the cliff base, creating a safe environment for both hikers and climbers. The hiking experience will be more aesthetic, less vigorous and safer for general users if the summit trail avoids the base of the cliff.

Conclusion

Silver Mountain is a premier rock climbing destination for climbers in Michigan and neighboring states. The majority of rock climbing route development has been completed with the potential for approximately a half dozen more routes east of existing routes. We suggest additional planning be considered for waste management and signage at this site. The UPCC and Access Fund are willing to partner with the Forest Service to develop a plan for maintenance of fixed anchors, sustainable waste management and maintenance of trails and signage to assure the safety and enjoyment of all users. UPCC and Access Fund request a meeting with the Forest Service to further discuss partnership opportunities and future management needs at Silver Mountain.

Access Fund and UPCC Assistance

The Access Fund, UPCC and area volunteers are available to assist the efforts of the Forest Service to manage this important recreational resource for the Upper Peninsula. Some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program⁵ and/or assistance from the AF Conservation Team.⁶ The Conservation Team helps maintain climbing areas throughout the United States by assessing area conservation needs, working with local climbers to address those needs, and providing training on stewardship best practices to keep those areas healthy.

 $http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/107979_FS-PLT3_4105656.pdf$

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⁵ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm

⁶ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation Team.htm.

* * *

Thank you for your consideration of these comments on the Ottawa National Forest Silver Mountain Recreation Site Improvement Project. Access Fund and UPCC have the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. Access Fund and UPCC look forward to participating throughout the entire planning process. 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.

Best Regards,

Katie Goodwin

Public Lands Associate, Access Fund

President, UPCC

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Cc:

Brady Robinson, Access Fund, Executive Director Erik Murdock, Access Fund, Policy Director Kyle Hrubecky, MTU Ridge Roamers Eric Krause, NMU South Superior Climbers Club Georgia Harrison, Marquette Climbers Co-operative Bill Thompson, Down Wind Sports