

December 12, 2006

Claire Harper
USDA Forest Service, Cooperative Forestry
1400 Independence Avenue, SW
Washington, D.C. 20250

**RE: ACCESS FUND COMMENTS ON UNITED STATES FOREST SERVICE 2006
OPEN SPACE CONSERVATION STRATEGY AND IMPLEMENTATION PLAN**

Dear Ms. Harper,

The Access Fund welcomes the opportunity to comment on the United States Forest Service's (USFS) 2006 Open Space Conservation Strategy and Implementation Plan, 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

As more fully explained herein, the Access Fund urges that USFS to recognize that human-powered recreation, specifically rock climbing, is an integral aspect of Open Space Conservation and to adopt programs, policy, and research that reflect this understanding. In the words of the first Chief of the Forest Service Gifford Pinchot, "World-wide practice of conservation and the fair and continued access by all . . . are the two indispensable foundations of continuous plenty and of permanent peace." It is our hope that our suggestions herein and those offered by Access Fund Programs Director Deanne Buck to Katie Goslee, USFS Landowner Assistance Specialist and Jon Haber, USFS Regional Conservation Planner, at the Conservation Fund-sponsored Roundtable Dialogue Listening Session in Golden, Colorado on Tuesday, December 5th (Third Listening Session), provide insight and perspective to the indispensable need for rock climbing opportunities as integral to the conservation of our nation's open space.

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. The experiences found only in our national forest system are some of the core opportunities the Access Fund seeks to preserve.

Rock Climbing in the Nation's Forests

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

Most climbers in the United States have, will, or aspire to climb in America's national forests. Indeed, the United States Forest Service oversees some of the nation's most significant and world-famous technical climbing areas such as the California's Needles in Sequoia National Forest and Tahquitz and Suicide in San Bernardino National Forest, Pikes Peak in Colorado's Pike National Forest, Cochise Stronghold in Arizona's Coronado National Forest, Rumney and Cathedral Ledge in New Hampshire's White Mountain National Forest, and Seneca Rocks in West Virginia's Monongahela National Forest. Each of these areas and many others represent truly world class climbing areas sought out by climbers from around the world.

There is a long tradition of climbing in America's national forests. Technical climbing in the forests of the Sierra Mountains, for example, goes back to the mid-1860s and continues today as one of that area's primary user groups. And in 1927 climbers were active on the East Coast when Appalachian Mountain Club members Robert Underhill, brother and sister Lincoln and Miriam O'Brien (later Underhill), Elizabeth Knowlton, Fritz Wiessner, and Bill House, and the cousins Bradley Gilman and Hassler Whitney all made belayed ascents of the steep rock faces of the Cannon, Cathedral, and Whitehorse cliffs in the White Mountains of New Hampshire. In many cases, technical climbing had been on-going at these areas long before Congress turned them into national forests under the jurisdiction of the USDA.

Given the central position that USFS lands occupy for climbing in the United States, the Access Fund seriously considers any changes to forest policy and works hard with local land managers and climbers to maintain the unique conditions of climbing environments in our national forests. Accordingly, we have helped cultivated an impressive tradition among the climbing community of conservation activism and stewardship in our national forests. Our Adopt-a-Crag program has spearheaded dozens of cleanups and trail maintenance projects across the country in our nation's forests. Additionally, each year the Access Fund directs membership dollars and corporate and community partner support into our Access Fund Grants Program, and many of our grants have benefited specific national forests. Climbing Preservation Grants are awarded for conservation projects, land acquisitions, scientific studies, local climber activism, and climber education around the country. Examples of Access Fund grants awarded at USFS units include the Buttermilks in California, Maple Canyon in Utah, Rumney in New Hampshire, and Yourak Pillars in Oregon.

United States Forest Service Open Space Policies

United States Forest Service management policies fill in the details not addressed by Congress in the many laws governing our Nation's Forests. In 2004, Chief Bosworth identified loss of open space as one of four threats to our nation's forest. "Growth and land conservation are often seen as two opposing forces—with proponents of each scrambling to beat the other to valuable land. Fortunately, a new paradigm is emerging. Development and conservation of open space can be compatible and complementary when applied in strategic, collaborative ways."² In USDA publication "Cooperating Across Boundaries: Partnerships to Conserve Open Space in Rural America," human-powered recreation is identified as one of the reasons open space is important.³ The Access Fund could not agree more.

² <http://www.fs.fed.us/projects/four-threats/>

³ Cooperating Across Boundaries: Partnerships to Conserve Open Space in Rural America (August 2006), pg. 9, "proximity to nature, whether a small park or a sweeping expanse of land for hiking, biking, birdwatching, or other outdoor pursuits. Open space can be considered a key part of human habitat as well as home for wildlife."

While the Access Fund agrees with the assessment that loss of open space as a threat to our nation's forest, we are concerned that the addition of strategies and priorities without a systematic evaluation of the existing efficiency and workload at the USFS will cause further delays in the completion of existing conservation priorities. At the Third Listening Session much discussion focused on a reprioritization of USFS goals that are accepted and implemented by all levels of USFS staff, from the Chief Forester to the on-the-ground ranger. As a human-powered recreation group with a dual mission of conservation of climbing resources and access to those resources, we are often stunted in our efforts to assist in the conservation of those resources on USFS land due to the pervasive bureaucracy that burdens progress. It was also discussed at the Third Listening Session that this culture of "paralysis by analysis" is systemic and can stymie even the most enthusiastic stewardship volunteer. Moving forward with a progressive vision of addressing loss of open space without an assessment of the barriers to conserving the resources currently under USFS jurisdiction seems premature. We, therefore, encourage the USFS to adopt a solution-oriented approach to on-the-ground conservation opportunities and make it easier for partner organizations to assist the USFS in mutually-beneficial projects.

The Access Fund urges the USFS to acknowledge in its policies the value that climbing and other human-powered recreation place on open space. We urge the USFS to specifically acknowledge the long-standing importance of recreational climbing within many of our national forests and provide direction for USFS land managers towards best climbing management practices including developing working partnership with all Access Fund Affiliates. Continued communication and working partnerships between stakeholders like climbers/mountaineers and the USFS regarding climbing issues and public needs will be necessary to ensure that current open space of the forest is protected. District rangers who manage these special recreation resources on the ground need specific guidance for reasonable and appropriate management policies that will allow them to think in innovative ways to preserve important open spaces.

Conclusion

The USFS provides unique and diverse climbing resource of significant importance. On behalf of the American climbing community, the Access Fund welcomes the USFS's efforts to solicit public input. We hope our comments will provide a meaningful contribution to both the substance and clarity of the Open Space policies for the USFS regarding planning objectives and strategies.

Thank you for opportunity to provide input and please do not hesitate to call me at 303.545.6772 x112 with any questions.

Respectfully Yours,

Deanne Buck
Programs Director
The Access Fund

cc: Jim Bedwell, USFS Director of Recreation and Heritage Resources
Katie Goslee, USFS Landowner Assistance Specialist
Jon Haber, USFS Regional Conservation Planner
Steve Matous, Access Fund Executive Director