

September 19, 2013

Dean Gould, Forest Supervisor Sierra National Forest 1600 Tollhouse Rd. Clovis, CA 93611

Email: pacificsouthwest-sierra@fs.fed.us

RE: Access Fund Comments on the Draft Assessment for the Sierra National Forest

Dear Forest Planning Team:

The Access Fund appreciates this opportunity to provide feedback on the Forest Plan Draft Assessment for the Sierra National Forest. The 2 million acres of Sierra National Forest (the Forest) provide a high concentration of world-class climbing opportunities, running the gamut from big-wall backcountry wilderness adventures to frontcountry bouldering test-pieces. We appreciate that climbing is acknowledged as one of the many recreational uses of the Forest. These comments are intended to assist planners develop appropriate alternatives that enhance and protect climbing access, while sustaining the health, diversity and productivity of the Forest.

The Access Fund

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and conserve 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—the 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. California is one of our larger member states and many of our members regularly travel to climb at Sierra National Forest. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

The rock and mountain climbing in the Sierra National Forest is some of the most popular, high quality and accessible of its kind in the country. The Forest contains several distinct climbing areas, ranging from world-renowned to obscure, are located within the Forest. Each area is unique, and site-specific considerations should determine the appropriate level of management. A comprehensive survey of climbing use patterns is critical to developing an effective recreation management plan for the Forest; however such climbing related data is currently not captured by

the Forest Service's *National Visitor Use Monitoring* (NVUM) program. Given the lack of national protocols for NVUM related to climbing, it is important that Sierra National Forest planners take extra measures to contact the climbing community to better inventory climbing activity and use patterns so that longstanding climbing access roads and trails are identified and appropriately managed and maintained. Furthermore, considering the lack of national Forest Service guidance on the use and placement of fixed anchors in wilderness, and the fact that an enormous amount of wilderness climbing occurs on the Forest, this Plan should clarify appropriate procedures for authorizing the *de minimus* use of these necessary climbing tools. The Access Fund, in consultation with local California climbers, can help planners inventory and understand climbing use patterns, local ethics, the history of each climbing area, and appropriate management policies that will protect and enhance these nationally-significant climbing opportunities.

Sierra National Forest Recreation Assessment

The Bio-regional Living Assessment notes that in the assessment for the plan development the Sierra National Forest "shall identify and evaluate existing information relevant to the plan area for ... Recreation settings, opportunities and access, and scenic character." Unfortunately, there is no NVUM data to support a thorough recreational assessment of climbing in the Forest. Notwithstanding the lack of climbing data, Sierra National Forest has an abundance of excellent climbing resources and is a popular destination for bouldering, sport climbing, and alpine and big wall climbing. These forms of climbing occur in all Recreation Opportunity Spectrum (ROS) classifications within the Forest. It is evident that climbing is an integral recreational pursuit within the Forest and should be acknowledged in its comprehensive recreation assessment.

Five specific recreational resources are identified in the Living Assessment, all of which are intrinsic aspects of climbing in the Sierra National Forest: 1) Recreation opportunity, 2) recreation setting, 3) sustainable recreation, 4) scenic character, and 5) recreation access are relevant to climbing resources within the Forest and important values key to high quality climbing experiences. The recreation opportunity for climbing in the Forest is vast and an important contributor to the local and regional economy, which is of particular relevance to the recreation assessment at hand. The Forest's recreation setting for climbing in general is impressively diverse, hosting climbing in wilderness, backcountry, alpine, and front country settings.

Sustainable recreation is of particular value to climbers, as they have a strong impetus to protect and steward the geologic resources on which they recreate. Scenic character is a fundamental aspect of the popularity of climbing in the Forest; climbers are similarly enthralled with the Forest's natural landscape as other user groups and they visit in large part because of the Forest's impressive and unique scenic values. Finally, recreation access is essential to providing climbing opportunities in the Forest through well-maintained trails to backcountry and frontcountry endeavors, and appropriate roads and parking areas associated with frontcountry settings.

If the "focus of the assessment for recreation is to identify and evaluate information about recreation settings and the uses, trends and sustainability of recreation opportunities in the plan area, recreational preferences of the public, recreational access, and scenic character" then the Forest should recognize climbing resources within all of its Recreation Opportunity Spectrum (ROS) classifications. As stated, there are vast opportunities for climbing in the Forest and resources occur on a diverse array of recreation settings.

Primitive recreation contributes to a great deal of climbing opportunities in the Forest and many climbers visit the area precisely and exclusively for this type of recreation. This includes many of the area's big wall and alpine routes that involve long, strenuous approaches in order to achieve the level of remoteness and solitude that primitive recreation offers. Semi-primitive non-motorized and motorized recreational opportunities also provide for many climbing areas in the Forest. These include less remote big wall and alpine climbs as well as single-pitch climbs that may require long, secluded approaches to access. Roaded natural areas are increasingly popular climbing destinations in the Forest due to the growing reputation of the area's quality bouldering. While many bouldering resources exist in remote areas of the backcountry, a great deal of it occurs near roaded areas that make such climbing easily accessible. Similarly, rural climbing opportunities mostly consist of bouldering and short single-pitch rope climbing near populated areas. Urban climbing opportunities are rare in the Forest, as there is little urban environment in the area.

It is evident that the Forest is host to an immensely diverse variety of climbing opportunities in an assortment of recreational settings. Climbing is prevalent in all of the Living Assessment's identified ROS classifications and should be included in the Forest Assessment if the ROS classifications are to truly benefit the public's desired benefits and outcomes. Similarly, climbing is extremely relevant to all of the recreational resources and, if properly acknowledged, will support the integrity and longevity of these resources. Climbing is both dependent upon and an asset to the Forest's natural and recreational resources.

Significant Climbing Resources on the Sierra National Forest

Below is a map and list with GIS coordinates of climbing areas within the Sierra National Forest.⁵

<u>Foothills</u> – 600-foot granite dome located about an hour northeast of Fresno, near Shaver and Huntington lakes. This area provides sport routes, multi-pitch traditional face climbing, and bouldering.

Tollhouse Rock - 37.033, -119.387 Squarenail - 37.0376, -119.4074 Shaver Lake - 37° 7'44.19"N, -119°12'33.08"W

Yeti Dome - 37.2102, -119.2393 Wilderness Wall - 37.2914, -119.1022

<u>Shuteye Ridge</u> – extensive climbing on dozens of high-quality granite domes scattered throughout the Sierras just south of Yosemite National Park.

Fresno Dome - 37°27'14.02"N, -119°32'12.09"W Upper Jackass Lake - 37°25'6.68"N, -119°28'12.47"W Shuteye Ridge - 37.35, -119.4276 High Eagle - 37.3736, -119.428 Maelstrom Dome - 37°21'44.11"N, -119°33'5.09"W

<u>Courtright Reservoir</u> – Two hours east of Fresno, the larger Courtright Reservoir area offers Tuolumne Meadows-quality climbing on domes up to 500 feet tall.

Winshon Reservoir - 37° 1'52.54"N, - 118°58'0.48"W Courtright Reservoir - 37° 4'18.77"N, 118°57'56.05"W Leopold Dome - 37.13962, -118.97024 The Obelisk - 36°54'28.44"N, -118°51'14.40"W

<u>High Sierra</u> – several classic High Sierra summits are partially located in the Sierra National Forest.

Bear Creek Spire - 37.3681, -118.767 Feather Peak - 37.326, -118.7782 Merriam Peak - 37.3088, -118.7651 Banner Peak - 37.696, -119.1946 Mount Ritter - 37.6894, -119.198 Clyde Minaret 37.6604, -119.174



Climbing Areas in the Sierra National Forest

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* has proven to be a useful tool for land managers across the country. The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the Forest my require to provide for the world class opportunities found in the Sierra National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team 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 Sierra National Forest. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that protect and enhance climbing opportunities while sustaining the health, diversity and productivity of the Forest. The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-819-2969) or email (jason@accessfund.org) to discuss this matter further.

Best Regards,

Jason Keith Sr. Policy Advisor

The Access Fund

Cc: Southern Sierra Climbers Association

¹ Draft Assessment of Sierra National Forest, at http://livingassessment.wikispaces.com/Sierra+NF+Composite+Edit.

² See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration with federal agencies.htm.

³ See *Draft Assessment of Sierra National Forest*, Chapter 9 at

http://livingassessment.wikispaces.com/Sierra+NF+Composite+Edit.

⁴ See *Draft Assessment of Sierra National Forest*, Chapter 9 at http://livingassessment.wikispaces.com/Sierra+NF+Composite+Edit#Chapter%209.

⁵ This list is not meant to be comprehensive; as will add to our database of climbing areas we will inform Forest planners of additional locations.

⁶ See http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf

⁷ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm

⁸ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation Team.htm