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Organization: Access Fund/Carolina Climbers Coalition

Title:

Comments: Access Fund-Carolina Climbers Coalition Objection to the Final Land Management Plan for the Nantahala and Pisgah National Forests

March 22, 2022

Objector's Name: Zachary Lesch-Huie, Access Fund; Mike Reardon, Carolina Climbers Coalition

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This objection is specific to the Nantahala and Pisgah National Forest Revised Land Management Plan (Forest Plan). The Responsible Official who will approve the Record of Decision for the Nantahala and Pisgah National Forests Plan Revision is James Melonas, Forest Supervisor, Nantahala and Pisgah National Forest Supervisor's Office. The Responsible Official for the species of conservation concern is Ken Arney, Regional Forester.

Submitted electronically via CARA Online Portal: <https://cara.ecosystem-management.org/Public/CommentInput?Project=43545>

1) THE FOREST PLAN'S CLIMBING MANAGEMENT STANDARDS RELATED TO NEW AND EXISTING CLIMBING ROUTES ARE NOT BASED ON APPROPRIATE ANALYSIS, MONITORING, OR EVALUATION

STATEMENT OF THE ISSUES AND/OR PARTS OF THE PLAN REVISION THE OBJECTION APPLIES TO:

REC-S-19 Until completion of a climbing management plan per REC-O-09, implement the following:

(a) New trails or climbing routes shall not traverse unique habitats or NRHP eligible, unevaluated, or sacred cultural resource sites on rocky summits, granitic domes, cliffs, or waterfall spray zones.

(b) Where existing trail use or climbing routes are impacting unique habitats or NRHP eligible, unevaluated, or sacred cultural resource sites, climbing routes shall be closed, unauthorized trails shall be obliterated, NFS trails shall be decommissioned or relocated, or other protective measures must be implemented to mitigate resource impacts. (Forest Plan, page 124)

CONCISE STATEMENT EXPLAINING THE OBJECTION AND SUGGESTION HOW THE DRAFT PLAN DECISION MAY BE IMPROVED

We object because REC-S-19 is not based on appropriate analysis, monitoring, or evaluation. REC-S-19 is overly and unnecessarily restrictive to climbing, and undermines future climbing management planning and collaboration as suggested in REC-O-09. Finally, REC-S-19 places far too much emphasis on closure as a management tool, without specifically describing impact mitigation alternatives which do not require closure.

Suggested new language:

REC-S-19 To manage and maintain desired climbing experiences, mitigate and reduce adverse impacts to natural and cultural resources, and support fulfillment of REC-O-9, implement the following:

(a) New trails or climbing routes that may traverse unique habitats or NRHP eligible, unevaluated, or sacred cultural resource sites on rocky summits, granitic domes, cliffs, or waterfall spray zones should be inventoried and evaluated for impacts to guide future management of the site.

(b) If unacceptable damage to natural or cultural resources is occurring, temporarily mitigate impacts from climbing routes until climbing management planning and implementation can occur to correct issues.

(c) The climbing management plan (CMP) shall incorporate inventory and evaluation of existing trail use or climbing route impact on unique habitats or NRHP eligible, unevaluated, or sacred cultural resource sites. The CMP should create a process to assess if climbing routes shall be closed, unauthorized trails or NFS trails shall be decommissioned or relocated, or other protective measures must be implemented to mitigate resource impacts.

#### STATEMENT THAT DEMONSTRATES THE LINK BETWEEN THE OBJECTOR'S PRIOR SUBSTANTIVE FORMAL COMMENTS AND THE CONTENT OF THE OBJECTION

Access Fund and Carolina Climbers Coalition (CCC) made substantial formal comments regarding desired climbing experiences, climbing area inventory, climbing management support and planning, climbing and rocky habitat management, and climbing impact mitigation to sensitive natural and cultural resources, all of which pertain to the issue with this standard. More specifically, we commented on this issue and guidance in the following comment letters submitted during the planning process.

Comments on the Draft Environmental Impact Statement and Proposed Land Management Plan for the Nantahala and Pisgah National Forests, submitted June 29, 2020:

Regarding analysis in the Rock Outcrops Unique Habitats section, we suggest making more clear distinctions between known threats and impacts versus potential threats and impacts. This is critically important because the distinctions would highlight areas for future research that could elucidate the best ways to manage climbing and protect natural and cultural resources. The climbing community has a long history of supporting science-based management, so identifying research needs instead of proposing unsubstantiated restrictions is critical to garnering support from climbers. It is also important to note that these rocky outcrop habitats constitute entire climbing areas. The growth in both general recreation and in climbing means that the Forest Service must consider how recreation management is integrated into other management activities, like protection for rock outcrop habitats, across the full extent of the national forest. The final DEIS and plan should specifically mention climbing and other recreational activities whenever there is an opportunity to do so. (page 4)

Unique and Rocky Habitats - See page 116, REC-S-19. Access Fund and CCC believe this Standard to be too broad in that it is unclear whether old trails and climbing routes would be closed; and in other ways too limited in not including other effective management actions such as education, rerouting, etc. To more fully support sustainable climbing, we recommend this Standard be deleted, or replaced with the following language:

Through a collaborative process, stakeholders, biologists, recreation groups, and regional Forest Service officials will work to identify areas of unique habitats in the forest. These groups will work to promote education and site specific plans to ensure that recreation does not have an adverse effect on unique habitats. (page 6-7).

Access Fund and CCC also made comments and recommendations with two separate Forest planning

collaborative groups, Nantahala-Pisgah Forest Partnership (Partnership) and Stakeholders Forum for the Nantahala & Pisgah Plan Revision (Stakeholders Forum). Both the Partnership and Stakeholders Forum submitted comments to the Proposed Final Plan, consistent in their support for Access Fund and CCC's climbing management guidance and proposed plan language.

The Partnership Comments on the Nantahala and Pisgah National Forests Proposed Land Management Plan, submitted June 25, 2020:

See page 116, REC-S-19. The Partnership finds this Standard to be too broad in that it is unclear whether old trails and climbing routes would be closed; and in other ways too limited in not including other effective management actions such as education, rerouting, etc. To more fully support sustainable climbing, we recommend this Standard be deleted, or replaced with the following language:

Through a collaborative process, stakeholders, biologists, recreation groups, and regional Forest Service officials will work to identify areas of unique habitats in the forest. These groups will work to promote education and site specific plans to ensure that recreation does not have an adverse effect on unique habitats. (page 84)

#### DOCUMENTS REFERENCED IN THE OBJECTION

No reference documents.

2) THE FOREST PLAN'S CLIMBING MANAGEMENT PLAN OBJECTIVE IS BASED ON PREDETERMINED AND UNDEFINED OUTCOMES THAT ARE MORE APPROPRIATELY ADDRESSED IN A CLIMBING MANAGEMENT PLAN

STATEMENT OF THE ISSUES AND/OR PARTS OF THE PLAN REVISION THE OBJECTION APPLIES TO:

REC-O-09 Tier 2: Over the life of the land management plan, develop a Nantahala and Pisgah National Forest climbing management plan in collaboration with representatives of the climbing community. The climbing management plan should utilize inventories of climbing routes, access trails, staging areas, and other information provided by users to develop area-specific management direction following the latest agency policy on climbing and similar activities. The climbing management plan should consider user desires to improve the climber experience, identify access trails suitable for addition to the system, explore climber education opportunities, identify site-specific resource protection measures and potential closures, and develop monitoring protocols. (Page 123)

Climbing Management Plan: Through a collaborative process with representatives from the climbing community, utilize inventories of climbing routes, access trails, staging areas, and other information provided by users to develop a climbing management plan (or plans) that provides area-specific guidance following the latest agency policy on climbing, bouldering, and similar activities. The climbing management plan(s) shall consider user desires to improve the climber experience, identify climber education opportunities, ensure resource protection, identify needed closures, and develop monitoring protocol for climbing and similar activities forest-wide over the life of the Plan. (REC-O-09-Tier 2) (Appendix A: Consolidated Forest Plan Objectives, page 306)

CONCISE STATEMENT EXPLAINING THE OBJECTION AND SUGGESTION HOW THE DRAFT PLAN DECISION MAY BE IMPROVED

We object because REC-O-09 is based on predetermined plan outcomes outlined in Recreation and Wilderness management standards REC-S-19 and CDW-S-05. These predetermined and undefined climbing policies pose potential challenges for future collaboration with the climbing community, and are more appropriately addressed within a climbing management planning process. REC-O-09 lacks clear guidance for Forest managers and

climbing management collaborators on how to initiate a plan and whether the plan is area-specific or Forest wide.

To address this issue we recommend changes and improvements to plan components REC-S-19 and CDW-S-05. The needed changes to REC-S-19 are described in detail in (1), above. The needed changes to CDW-S-05 and RW-S-13 are described and explained in detail in (3), below. These important changes will better support a collaborative climbing management planning process, a significant Forest Plan objective, and provide for balanced and effective natural and recreational resource management until a climbing management plan (or plans) is completed.

Lastly, REC-O-09 on page 123 is inconsistent with REC-O-9 as written on page 306 of Appendix A: Consolidated Forest Plan Objectives in key ways. The language should be consistent. We recommend the Appendix language for this objective on page 306.

#### STATEMENT THAT DEMONSTRATES THE LINK BETWEEN THE OBJECTOR'S PRIOR SUBSTANTIVE FORMAL COMMENTS AND THE CONTENT OF THE OBJECTION

Access Fund and CCC made substantial formal comments regarding climbing management and specifically proposed climbing management strategies and/or plans. More specifically, we commented on this issue and guidance in the following comments submitted during the planning process:

Comments on the Draft Environmental Impact Statement and Proposed Land Management Plan for the Nantahala and Pisgah National Forests, submitted June 29, 2020:

We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country. (page 2)

Our publication, Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan, and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country. (page 3)

Access Fund and Carolina Climbers' Coalition Assessment Comments for Nantahala and Pisgah National Forests Land and Resource Management Plan Revision, submitted April 30, 2013:

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. (page 7)

Access Fund Comments on the Draft Assessment for the Pisgah and Nantahala National Forest, submitted November 11, 2013. (See page 3-4, same language as above)

Access Fund Comments on Revising the Nantahala and Pisgah Land Management Plan - Preliminary Need to Change the Existing Land Management Plan, submitted April 25, 2014:

We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country. (page 3)

Our publication, Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan, and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country. (page 4)

Access Fund Comments on Nantahala and Pisgah Land Management Planning - Desired Conditions, Management Areas, Recommended Wilderness, and Place Based Recreation, submitted January 14, 2015:

We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country. (page 4)

Our publication, Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan, and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country. (page 4)

Nantahala-Pisgah National Forest Plan Revision: Wilderness Inventory Areas-Evaluation Phase, submitted December 15, 2015:

Footnote 3 Our publication, Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan [https://www.accessfund.org/uploads/ClimbingManagementGuide\\_AccessFund.pdf](https://www.accessfund.org/uploads/ClimbingManagementGuide_AccessFund.pdf), and website [www.climbingmanagement.org](http://www.climbingmanagement.org), have both proven to be a useful tool for land managers across the country. (page 5)

Nantahala-Pisgah National Forest Plan Revision: Climbing Recommendations for Preliminary Plan Content, submitted October 1, 2017:

The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund maintains an active Memorandum of Understanding with the United States Forest Service. (page 1)

Comments on the Draft Environmental Impact Statement and Proposed Land Management Plan for the Nantahala and Pisgah National Forests, submitted June 29, 2020:

Climbing Strategy - See page 114, REC-O-09. Access Fund and CCC absolutely support and practice effective climbing management strategy on NPNF, in partnership with Forest managers and other stakeholder groups.<sup>14</sup> However, we do not support the specific REC-O-09, which was proposed without any preliminary discussion with Access Fund, Carolina Climbers Coalition or the climbing community. It would leave fundamental climbing management elements already scoped and decided in other parts of the plan, elements which we very early in the planning process identified as important, and for which we have provided detailed and specific information in meetings and comment letters. We do not believe a strategy building process for climbing (or any use) should start with predetermined outcomes on important climbing management issues. Further, our current understanding of the proposed "climbing strategy" is incomplete and vague. It is not clear whether it is a formal planning process, subject to NEPA, or another kind of planning-like process; how input from such a process will be incorporated into projects, plans and management; and how, as a plan component, it avoids the pitfall of "planning to plan." The basis for including slacklining, but not, for example, hiking, which is an equal or greater vector for impact in rocky environments, adds to our confusion about this direction. Slacklining is a distinct emerging forest use. By contrast, climbing is a popular 70+ year historic use of the NPNF, including over 300 climbing special use permit holders. Climbing should not be conflated with slacklining or any other forest use; doing so will lead to inaccurate assessment and poor management outcomes. In general our approach has been to recommend high level guidance, applicable forestwide, that aids managers and climbers on area or site specific management and projects (similar to Shoshone NF or White Mountain NF plans). This direction is informed by success in other National Forests, forest plans and decades of work with USFS and other federal

agencies on climbing management. Access Fund and CCC recommend a consistent approach that includes comprehensive forestwide climbing components in the plan now, so climbers and Forest managers have the direction and certainty they need to tackle site, resource, or area-specific climbing management concerns in future projects or collaborative work. (page 6)

See also pages 1-3, 6-7, and 10.

Through the Partnership and Stakeholders Forum, Access Fund and CCC also submitted comments to the Proposed Final Plan regarding the climbing management strategy or plan.

The Partnership Comments on the Nantahala and Pisgah National Forests Proposed Land Management Plan, submitted June 25, 2020:

See page 114, REC-O-09. The Partnership does not support this Objective, which was proposed without any preliminary discussion with Access Fund, Carolina Climbers Coalition or the climbing community. The deferral of climbing guidance is the epitome of "planning to plan." The Forest Service needs to incorporate climbing into Plan components now, in this NEPA-governed planning process, not plan (or strategize) to do it later.

Throughout the planning process, the Partnership, and in particular the Access Fund and Carolina Climbers Coalition, have provided large amounts of input and climbing related information for planners to formulate objectives and guidelines in the forest plan, now, in this NEPA-governed planning process.

The Partnership objects to this Objective, and the Plan more generally, incorporating other distinct recreational activities into climbing management plan components. Slack lining and climbing and hiking or other recreational activities should not be mistaken as the same thing and such inaccuracies lead to poor, ineffective Management.

The Draft Plan is inconsistent in including some climbing management direction in the plan now, such as page 259, CDW-S-05, but other direction is apparently deferred to a Tier 2 future climbing management strategy. The Partnership recommends a consistent approach that includes comprehensive forestwide climbing components in the plan now, that provides for tackling site, resource, or area-specific climbing management concerns in future projects or collaborative work. (page 83-84)

Stakeholders Forum Areas of Agreement and Continuing Discussion on the Draft Nantahala and Pisgah Forests Plan, submitted June 29, 2020:

Climbing: REC-O-09 (P.114) OM Tier 2: Through a collaborative process, develop a Nantahala and Pisgah National Forests climbing strategy that provides guidance on rock climbing, bouldering, and slack lining; guidance shall address climbing in general forest and designated areas." This objective is inconsistent and unclear why some climbing management guidelines are included in the plan now, such as P. 259, CDW-S-05, but others are put off for a Tier 2 future climbing management strategy. The need for this exception is not clear and we recommend the inclusion of comprehensive, forestwide climbing components in the plan now, and tackling site, resource or area specific climbing management concerns in future projects or collaborative Work. (page 10)

#### DOCUMENTS REFERENCED IN THE OBJECTION

No documents referenced.

3) THE FOREST PLAN'S PROPOSAL FOR WILDERNESS FIXED ANCHORS FOR CLIMBING IS PREDECISIONAL AND FAILS TO ANALYZE HOW IT RELATES TO THE PLAN OBJECTIVE TO CREATE A CLIMBING MANAGEMENT PLAN

#### STATEMENT OF THE ISSUES AND/OR PARTS OF THE PLAN REVISION THE OBJECTION APPLIES TO:

CDW-S-05 and RW-S-13 Installation or replacement of fixed anchors for climbing or similar activities shall only be done following the latest agency policy on climbing and with the appropriate analysis and line officer approval to ensure no ecological or cultural resource damage occurs and that wilderness values are not impacted. If user installation or replacement is approved, anchors shall be of a non-reflective or camouflaged finish. Use of motorized drills is prohibited (Forest Plan, pages 272 and 278).

#### CONCISE STATEMENT EXPLAINING THE OBJECTION AND SUGGESTION HOW THE DRAFT PLAN DECISION MAY BE IMPROVED

We object to CDW-S-05 because it is predecisional to the climbing management plan goal set in REC-O-09. CDW-S-05 concerns a significant climbing management component, yet it does not include an important and critically needed mention or description of how CDW-S-05 relates to the Plan objective to create a climbing management plan or plans. Further, it does not distinguish between placement of new fixed anchors and existing fixed anchors. Replacement of already established fixed anchors is maintenance activity on an already established climbing resource and does not need case-by-case analysis and line officer approval. Replacement is important to manage for established desired climbing experience and critical climber safety systems. Future climbing management plan(s) should address and clarify approval processes for placement and replacement of fixed anchors.

#### Suggested new language:

CDW-S-05 and RW-S-13 To manage for wilderness climbing opportunities and ensure that no ecological or cultural resource damage occurs and that wilderness values are not adversely impacted, placement of new fixed anchors for climbing shall only be done following the latest agency policy on climbing and with the appropriate analysis and line officer approval to ensure no ecological or cultural resource damage occurs and that wilderness values are not adversely impacted. If fixed anchor use is approved, anchors shall be of a non-reflective or camouflaged finish. Line officer approval associated with this standard is not a special use permitting process and is an informal review and approval process conducted collaboratively with representatives of the climbing community. Replacement of existing fixed anchors for maintenance is programmatically authorized and does not require line officer approval. Use of motorized drills is prohibited for placement and replacement. Future climbing management planning may change or clarify this standard.

#### STATEMENT THAT DEMONSTRATES THE LINK BETWEEN THE OBJECTOR'S PRIOR SUBSTANTIVE FORMAL COMMENTS AND THE CONTENT OF THE OBJECTION

Access Fund and CCC made substantial formal comments regarding wilderness climbing management and wilderness climbing fixed anchor guidance. More specifically, we commented on this topic in the following comments submitted during the planning process.

Access Fund and Carolina Climbers' Coalition Assessment Comments for Nantahala and Pisgah National Forests Land and Resource Management Plan Revision, submitted April 30, 2013:

The Plan needs to acknowledge the legitimacy of fixed anchor use within the Forests. "A fixed anchor is defined as any piece of climbing equipment that is left in place to facilitate a safe ascent or rappel. Examples include, but are not limited to, bolts, pitons, and slings." Fixed anchors are an inherent and important part of climbing safely in front-country, backcountry, and wilderness. The local ethic is to use fixed anchors judiciously and the current prohibition against power drills in wilderness is the best means to minimize the unnecessary proliferation of bolts in designated wilderness areas. A stronger partnership between the Forests and local climbing community and a

simplified project approval process will allow climbers to better mitigate climbing related impacts. Climbers want to contribute to the sustainable management of Forests' trails and natural resources. (page 2)

Access Fund Comments on the Draft Assessment for the Pisgah and Nantahala

National Forest, submitted November 11, 2013:

Furthermore, considering the lack of national Forest Service guidance on the use and placement of fixed anchors in wilderness, and the fact that a significant 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. (page 2)

Access Fund Comments on Revising the Nantahala and Pisgah Land Management Plan - Preliminary Need to Change the Existing Land Management Plan, submitted April 25, 2014:

The Document identifies the need to "update plan direction for managing wilderness. There are several established climbing areas within the Forests' designated wilderness. The Access Fund and CCC agree that there is a need to update wilderness management direction and strongly recommend that future wilderness management include provisions that recognize rock climbing as a legitimate wilderness activity and the conditional use of fixed climbing anchors as appropriate. Fixed anchors are necessary tools for climbing and the local ethic dictates judicious use of fixed anchors and honors the current prohibition against power drills in designated wilderness. The Access Fund and CCC fundamentally believe that the ability of climbers to place a de minimus number of wilderness fixed anchors is a privilege worth protecting because it embodies "outstanding opportunities for solitude or a primitive and unconfined type of recreation." Many federal public lands have included such provisions in their management plans and we recommend that the Forests include recognition that conditional use of fixed anchors is appropriate within the revised Nantahala and Pisgah Land Management Plan. (page 2-3)

Nantahala-Pisgah National Forest Plan Revision: Wilderness Inventory Areas-Evaluation Phase, submitted December 15, 2015. (See pages 2-3)

Nantahala-Pisgah National Forest Plan Revision: Climbing Recommendations for Preliminary Plan Content, submitted October 1, 2017:

#### Climbing Fixed Anchors

Early in the NPNF Forest Planning process Access Fund and CCC identified climbing fixed anchors as an important topic to address in the NPNF plan revision. Past NP Forest Management Plans have not addressed or included guidance on climbing fixed anchors, despite continuous and growing climbing use, and climbing fixed anchor use, for more than 70 years. Climbing fixed anchors are essential for the climbing experience, safety, and a recognized management tool for resource protection and management of visitor use and flow. Replacement of old fixed anchors on NPNF is a maintenance need broadly recognized by the climbing community. We are therefore recommending new guidance for climbing fixed anchors as a new Standard for Wilderness and non-Wilderness areas of the Forest, along with the USFS definition.

After collaborative work with the climbing community, input and support from The Forest Partnership and The Forum and ongoing collaborative work with national-level USFS Recreation, Heritage and Volunteer Resources staff, we specifically recommend new guidance for climbing fixed anchors as a new Standard for Wilderness and non-Wilderness areas of the Forest, along with the USFS definition. We recommend this new guidance be included as Standard under Recreation Settings: Opportunities. The Wilderness specific guidance may also be included in the Wilderness management section of the plan.<sup>6</sup> We recommend including the USFS definition of climbing fixed anchors definition in the appropriate Appendix or definitions section of the Plan. These



recommendations are listed below.

Recommendation - Climbing Fixed Anchors Definition: Climbing fixed anchors are defined as climbing equipment (e.g., bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain (USDA Forest Service, 1999).

Recommendation - Non-Wilderness Management Areas: Fixed anchors are essential for climbing, and climbers may use, place and replace fixed anchors. Fixed anchors for climbing can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. Fixed anchor hardware should be climbing-specific and comply with modern, currently accepted standards. Fixed anchors should be camouflaged to match the surrounding Environment.

Recommendation - Wilderness: Fixed anchors are essential for climbing, and climbers may use, place and replace fixed anchors. Fixed anchors for climbing can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. In Wilderness, climbers should use fixed anchors as a last resort, where removable anchor placements are not viable. Motorized drills are prohibited for placement of new fixed anchors in Wilderness. Fixed anchors should be camouflaged to match the surrounding environment. (pages 3-5)

Comments on the Draft Environmental Impact Statement and Proposed Land Management Plan for the Nantahala and Pisgah National Forests, submitted June 29, 2020:

Most of the existing climbing areas within NPNF use fixed anchors (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to the climbing community. (page 2)

Climbing Fixed Anchors - See Page 116. Access Fund and CCC have substantial, longstanding concerns with the lack of Guideline or Standard in the Recreation section, to provide climbing management and fixed anchor direction for Forest managers and partners. Consistent with our past comments, and 2017 Partnership and Forum recommendations, we recommend inclusion of this updated language, as a forestwide Standard or Guideline for climbing fixed anchors.

Fixed anchors are defined as climbing equipment (e.g., bolts, pitons, or slings) left in place to facilitate ascent or descent of technical terrain. These anchors are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents and descents (rappels) where removable anchor placements are not viable. Rock climbing fixed anchors can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. Fixed anchor hardware should be climbing-specific and comply with modern, currently accepted standards. Climbers may use, place and maintain fixed anchors, including any fixed anchors established before the date of the enactment of this plan. Placement of new rock climbing fixed anchors may require prior authorization to protect natural and cultural resources. Programmatic authorization is the primary mechanism for fixed anchor management as it protects resources while minimizing burden to land managers and forest visitors. Site specific authorization should only be implemented to manage areas with documented sensitive or endangered resources. Motorized drills are prohibited for placement of new fixed anchors in Wilderness.

(Footnote to section above) Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>. (page 7)

Wilderness Climbing and Climbing Fixed Anchors - See page 259, CWD-S-05. Access Fund and CCC have serious concerns with this Standard and recommend significant modification for us to support the Standard, and

to provide for a realistic and implementable Standard that manages for climbing as an appropriate Wilderness activity, including use of climbing fixed anchors. We recommend the following language replace CWD-S-05. This Standard should be specific to climbing and the USFS definition of climbing fixed anchors; other recreational activities that may use fixed anchors, such as slacklining, should be treated separately (again, to ensure effective management outcomes climbing should not be conflated with slacklining or any other use). Climbing should be managed for climbing, and not supplanted by any other activity, even if it happens to be proximate. Access Fund and CCC recommend the following for an adjustment to draft CWD-S-05:

Manage Wilderness climbing as an appropriate Wilderness activity that requires self-reliance and provides for solitude and unconfined recreation. Climbers are a key part of the community of partners and users in Wilderness. Allow climbing fixed anchors where necessary to provide for outstanding Wilderness climbing opportunities, improve social conditions, protect natural resources, and enhance climber safety. Climbers may use, place and maintain fixed anchors, including any fixed anchors established before the date of the enactment of this plan. Placement of new rock climbing fixed anchors may require prior authorization to protect natural and cultural resources. Programmatic authorization is the primary mechanism for fixed anchor management as it protects resources while minimizing burden to land managers and Forest visitors. Site specific authorization should only be implemented to manage areas with documented sensitive or endangered resources. Motorized equipment (e.g. power drills) are not allowed in Wilderness and shall not be used for placement of fixed anchors. Climbing that does not rely on the use of fixed anchors and is consistent with Leave No Trace ethics and skills should be the norm in Wilderness. Climbers should use removable protection whenever possible.

Notably, other USFS management plans and recent federal legislation acknowledges the legitimacy of Wilderness climbing and fixed anchor use.

RECREATIONAL CLIMBING.-Nothing in this plan prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this plan-

(1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and

(2) subject to any terms and conditions determined to be necessary by the Secretary. (page 8-9)

Access Fund and CCC also made comments and recommendations on this issue with the Partnership. The Partnership Comments on the Nantahala and Pisgah National Forests Proposed Land Management Plan, submitted June 25, 2020:

The Partnership has concerns with the lack of Guideline or Standard in the Recreation section, to provide climbing management direction for Forest managers and partners. Consistent with our 2017 Partnership recommendation we recommend inclusion of the following as a Standard or Guideline for climbing fixed anchors:

Fixed anchors are defined as climbing equipment (e.g., bolts, pitons, or slings) left in place to facilitate ascent or descent of technical terrain. These anchors are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents and descents (rappels) where removable anchor placements are not viable. Rock climbing fixed anchors can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. Fixed anchor hardware should be climbing-specific and comply with modern, currently accepted standards. Climbers may use, place and maintain fixed anchors, including any fixed anchors established before the date of the enactment of this plan. Placement of new rock-climbing fixed anchors may require prior authorization to protect natural and cultural resources. Programmatic authorization is the primary mechanism for fixed anchor management as it protects resources while minimizing burden to land managers and forest visitors. Site specific authorization should only be implemented to manage areas with documented sensitive or endangered resources.

Motorized drills are prohibited for placement of new fixed anchors in Wilderness.

#### DOCUMENTS REFERENCED IN THE OBJECTION

Our objection and suggested new language is also based in a section from the 2021 FEIS. See In the Response from Commenters section, where planners provide the following explanation:

The Plan has no restrictions on use of fixed anchors for climbing, except for requiring line officer approval for installation or replacement of fixed anchors within designated and recommended wilderness. These standards have been updated to clarify that line officer approval is to ensure there are no impacts to natural or cultural resources, or wilderness values. Line officer approval associated with this standard is not referring to a special use permitting process but would be an informal review and approval process conducted collaboratively with representatives of the climbing community. The Standard also requires that non-reflective or camouflage anchors be used. (page 111)

4) THE FOREST PLAN'S PEREGRINE FALCON MANAGEMENT PROPOSAL DOES NOT CONSIDER EXISTING AND EFFECTIVE MANAGEMENT PRACTICES AND INACCURATELY DIRECTS MANAGEMENT FOCUS TO FOUR SPECIFIC RECREATIONAL USES WHILE OMITTING OTHER ACTIVITIES KNOWN TO CAUSE FALCON DISTURBANCE

STATEMENT OF THE ISSUES AND/OR PARTS OF THE PLAN REVISION THE OBJECTION APPLIES TO:

PAD-S-05 Manage climbing, rappelling, hang gliding, the use of drones and other nest disturbing activities in the vicinity of active peregrine falcon nesting sites from January 15th to August 15th to control human disturbance and encourage successful nesting and fledging. (Page 81)

CONCISE STATEMENT EXPLAINING THE OBJECTION AND SUGGESTION HOW THE DRAFT PLAN DECISION MAY BE IMPROVED

PAD-S-05 is inconsistent with other peregrine management goals, guidance and resource description in the Plan; does not adequately include established, current, and effective peregrine management practices on the Forest; and inaccurately directs management focus to four specific recreational uses, while omitting other recreational uses or management activity that are known to cause potential disturbance to peregrine falcons. We object because specific recreation activities are mentioned as causing disturbances, but not others, such as hiking and all other human based activities that could cause nest disturbances in Rocky Habitats. Partnerships and stewardship collaborations are also not mentioned and should be because they are key management practices with longstanding success on the Nantahala and Pisgah National Forest(Forest) , and are generally known to lead to improved management outcomes. Additionally, this language is not consistent with other guidance and description, such as in the Geographic Area Goals (EE-GLS-03, PL-GLS-03, and HD-GLS-06), which may lead to confusion, misinterpretation or poor implementation. For example, PL-GLS-03 reads: "Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure of select rock faces, and collaboration with the climbing and recreation community." Closure dates should be based on monitoring of nest activity, not a static, blanket closure. Currently the Forest, the climbing community, and North Carolina Wildlife Resources Commission (NC Wildlife) collaborate to conduct monitoring and practice adaptive management for seasonal closures of nesting sites. Through this process areas are closed not based on a static set of dates each year, but rather on the presence of an active nest which is lifted once the nesting activity is complete for the season. The recreation community appreciates this management practice and requests that the language in the Forest plan reflect the need for adaptive management and active monitoring to determine the location and duration of seasonal nest closures. Current plan language will not perpetuate current best practice as supported by USFS, NC Wildlife, and climbing community.

Suggested new language:

PAD-S-05 Manage human activities and other nest disturbing activities in the vicinity of active peregrine falcon nesting sites during nesting season to control human disturbance and encourage successful nesting and fledging. Base seasonal closures on monitoring and nesting activity. Collaborate with the climbing and recreation community on monitoring and setting dates for seasonal climbing closures. (See also REC-S-19)

#### STATEMENT THAT DEMONSTRATES THE LINK BETWEEN THE OBJECTOR'S PRIOR SUBSTANTIVE FORMAL COMMENTS AND THE CONTENT OF THE OBJECTION

During the planning process, Access Fund and Carolina Climbers Coalition (CCC) made substantial formal comments regarding peregrine falcon and climbing management. Those comments are summarized below.

Access Fund and Carolina Climbers' Coalition Assessment Comments for Nantahala and Pisgah National Forests Land and Resource Management Plan Revision, submitted April 30, 2013:

Current climbing management allows sufficient recreational access while protecting natural and cultural resource values. For example, seasonal peregrine closures at Whiteside, N.C. Wall, and other cliffs successfully balance peregrine falcon protection with recreational access. (page 2)

Access Fund Comments on the Draft Assessment for the Pisgah and Nantahala National Forest November 11, 2013 (page 5, same language as above)

Access Fund Comments on Revising the Nantahala and Pisgah Land Management Plan - Preliminary Need to Change the Existing Land Management Plan April 25, 2014 (page 3, same language as above)

Nantahala-Pisgah National Forest Plan Revision: Climbing Recommendations for Preliminary Plan Content, submitted October 1, 2017:

Cliff vegetation and cliff-nesting raptors, such as peregrine falcons, are two important focus areas for our management support, research, education, and land manager collaboration. In general, necessary closures if needed should be science and monitoring based, site-specific, and flexible to accommodate changes in wildlife behavior, the environment or recreational use patterns. (page 3)

Regarding peregrine falcon protection and climbing management, we recommend changes to corresponding Geographic Area goal language in the Eastern Escarpment, Pisgah Ledge, and Highland Domes GAs; and Forestwide in the Management Approach language for plan chapters Threatened and Endangered Species and/or Species of Conservation Concern.

Recommendation - Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure orders on rock faces, and collaboration with the climbing and recreation community. (page 3)

Comments on the Draft Environmental Impact Statement and Proposed Land Management Plan for the Nantahala and Pisgah National Forests, submitted June 29, 2020:

While we acknowledge and appreciate the description of climbing across the NPNF and in all Geographic areas, and the inclusion of our recommended language for peregrine falcon and climbing management, we are concerned that the draft plan does not give sufficient, needed direction for climbing and recreation. (page 4)

Peregrine Falcons and Cliff-Nesting Raptors - See page 88, PAD-S-05. Access Fund and CCC recommend changing this Standard and replacing it with the same language pertaining to peregrine falcons as used in PL-

GLS-04:

'Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure of select rock faces, and collaboration with the climbing and recreation community.'

The above language is sufficient for optimal management, and consistent with more than two decades of successful peregrine falcon and climbing access protection on NPNF. Hallmarks of this effective approach include the ongoing collaboration between NC Wildlife, CCC, Access Fund, and NPNF; management decisions based on the best available science, monitoring, and other information; close partnership with the climbing community; and an overall approach which seeks balance and avoids or reduces conflict, allowing for wildlife and climbing resources to thrive. (page 5)

Peregrine Falcons - See page 156, PL-GLS-04. Access Fund and CCC supports this Goal; however, we recommend that this language should be used for ALL Geographic Areas mentioning peregrine falcon closures. We recommend that each area re- words the Goal to this language already in the plan:

Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure of select rock faces, and collaboration with the climbing and recreation community. (page 8)

Access Fund and CCC also made comments and recommendations through two separate Forest planning collaborative groups, Nantahala-Pisgah Forest Partnership (Partnership) and Stakeholders Forum for the Nantahala & Pisgah Plan Revision (Stakeholders Forum). Both the Partnership and Stakeholders Forum submitted comments to the Proposed Final Plan, consistent in their support for Access Fund and CCC's climbing management guidance and proposed plan language.

The Partnership Comments on the Nantahala and Pisgah National Forests Proposed Land Management Plan, submitted June 25, 2020:

See page 88, PAD-S-05. The Partnership recommends changing this Standard by using the same language pertaining to peregrine falcons as used in PL-GLS-04:

Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure of select rock faces, and collaboration with the climbing and recreation community. (page 78)

Pisgah Ledge Geographic Area

See page 156, PL-GLS-04. The Partnership supports this Goal; however, we recommend that this language should be used for ALL Geographic Areas mentioning peregrine falcon closures. We recommend that each area re-words the Goal to this language already in the plan:

Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure of

select rock faces, and collaboration with the climbing and recreation community. (page 87)

Stakeholders Forum Areas of Agreement and Continuing Discussion on the Draft Nantahala and Pisgah Forests Plan, submitted June 29, 2020:

Climbing: PAD-S-05: Peregrine Closures p. 88: Peregrine closure are referenced numerous times throughout the plan. Many of the closures written in GA's do not reference partnership with the climbing community. Partnership has proven to be beneficial for both peregrines and recreation. We recommend using the language used in PL-GLS-04 in all of the peregrine closure listings, which will provide consistency throughout the plan: "Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure of select rock faces, and collaboration with the climbing and recreation community. (page 11)

#### DOCUMENTS REFERENCED IN THE OBJECTION

See Access Fund's Climbing and Raptors: A Handbook for Adaptive Management (Access Fund, 2021).

#### 5) THE FOREST PLAN'S CLOSURE-BASED MANAGEMENT APPROACH FOR WILDERNESS CLIMBING ARBITRARILY CONFLATES CAMPING AND CLIMBING AND LEAVES OTHER WILDERNESS RECREATIONAL USES AND IMPACTS UNADDRESSED

#### STATEMENT OF THE ISSUES AND/OR PARTS OF THE PLAN REVISION THE OBJECTION APPLIES TO:

Naturalize and close campsites, unauthorized climbing access routes, and climbing staging areas where resource damage or impacts to wilderness characteristics are occurring. Consider long-term site closures when other management techniques are not successful. (Page 274, Management Approaches, fourth paragraph)

#### CONCISE STATEMENT EXPLAINING THE OBJECTION AND SUGGESTION HOW THE DRAFT PLAN DECISION MAY BE IMPROVED

This Management Approach section arbitrarily conflates camping and climbing use. It is too selective of two specific recreational uses, while leaving other wilderness recreational uses and impacts unaddressed. It also lacks needed reference to assessment and management techniques derived from a climbing management plan. Description of "unauthorized climbing access routes" is confusing and should be clarified as off-trail travel or nonsystem trail. Finally, other non-closure management techniques should be described more explicitly, such as education, erosion control or stabilization.

#### STATEMENT THAT DEMONSTRATES THE LINK BETWEEN THE OBJECTOR'S PRIOR SUBSTANTIVE FORMAL COMMENTS AND THE CONTENT OF THE OBJECTION

During the planning process, Access Fund and CCC made substantial formal comments regarding wilderness climbing management, science and monitoring-based management, and managing for distinct recreational uses. Relevant comments are summarized below.

Comments on the Draft Environmental Impact Statement and Proposed Land Management Plan for the Nantahala and Pisgah National Forests, submitted June 29, 2020:

Climbing should not be conflated with slacklining or any other forest use; doing so will lead to inaccurate assessment and poor management outcomes. (page 6)

Nantahala-Pisgah National Forest Plan Revision: Climbing Recommendations for Preliminary Plan Content, submitted October 1, 2017:

Designation or closure are available as management actions, however they are not always feasible, necessary or desirable solutions. Erosion control and other mitigation strategies like education offer effective alternatives that have proven to be successful on National Forests across the U.S. and here on NPNF. (page 5)

Access Fund Comments on Revising the Nantahala and Pisgah Land Management Plan - Preliminary Need to Change the Existing Land Management Plan, submitted April 25, 2014:

The Document identifies the need to "update plan direction for managing wilderness." There are several established climbing areas within the Forests' designated wilderness. The Access Fund and CCC agree that there is a need to update wilderness management direction and strongly recommend that future wilderness management include provisions that recognize rock climbing as a legitimate wilderness activity and the conditional use of fixed climbing anchors as appropriate. (page 2)

#### DOCUMENTS REFERENCED IN THE OBJECTION

No documents referenced.

For the reasons outlined herein, we object to the Nantahala and Pisgah National Forest Revised Land Management Plan as drafted for at least five different categories. In summary, the Forest Plan's climbing management standards related to new and existing climbing routes are not based on appropriate analysis, monitoring, or evaluation, and the Forest Plan's climbing management plan objective is based on predetermined and undefined outcomes that are more appropriately addressed within a climbing management planning process. Furthermore, the Forest Plan's proposal for wilderness fixed anchors for climbing is predecisional and fails to analyze how it relates to the plan objective to create a climbing management plan. Also, the Forest Plan's peregrine falcon management proposal does not consider existing and effective management practices and inaccurately directs management focus to four specific recreational uses while omitting other activities known to cause falcon disturbance. Finally, the Forest Plan's closure-based management approach for wilderness climbing arbitrarily conflates camping and climbing and leaves other wilderness recreational uses and impacts unaddressed.

Sincerely,

Zachary Lesch-Huie Mike Reardon

V-P Programs & Acquisitions Executive Director

Access Fund Carolina Climbers Coalition