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Forest Archaeologist / Heritage Program Manager  
Angeles National Forest  
701 N. Santa Anita Avenue  
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November 24, 2010

**Subject: Comments on Williamson Rock Critical Habitat Closure Environmental Assessment**

Dear Mr. Vance:

Thank you for the opportunity to provide scoping comments on the Environmental Assessment (EA) for the Williamson Rock Critical Habitat Closure. The Allied Climbers of San Diego (ACSD) is very interested in protecting the environment and species of Williamson Rock while allowing for appropriate, low-impact recreational use.

ACSD is a 501(c)3 California Non-Profit Corporation representing climbers' interests in promoting responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, conservation, and minimum impact practices. ACSD represents the collective interests of thousands of Southern California climbers in working to educate parties involved in access issues that climbing resources are valuable recreational resources to the public and that climbing is a legitimate, low impact, human-powered activity.

**Proposed Action**

ACSD does not support the Angeles National Forest (ANF) Proposed Action to implement an indefinite closure of Williamson Rock for another “three to five years or more,” as stated in the EA. The Proposed Action unnecessarily restricts use of an irreplaceable recreation resource which clearly exists outside MYLF critical habitat. The Proposed Action justifies closure even though mitigation measure identified in the Recreation Development Alternative will effectively meet the *justified needs* of the Proposed Action, as stated in the EA: 1) to monitor the critical habitat of the Upper Little Rock Creek MYLF population while the nearby 2009 Station Fire burn area naturally recovers, and 2) to preserve the viability of MYLF populations in the San Gabriels by reducing the potential for human/frog interaction while the neighboring population segments are allowed to respond to the effects of the [Station] fire.

**Recreational Development Alternative**

ACSD respectfully requests that the USFS adopt the Recreational Development Alternative. This alternative permanently closes access to—and fully protects from disturbance and damage through mitigation measures—mountain yellow-legged frog (MYLF) critical habitat. Measures listed in the Recreation Development Alternative effectively create an environment that will allow the ANF to responsibly re-open those areas outside MYLF habitat that were closed by the ANF in 2005 to study the issue of MYLF protection while simultaneously developing a project to re-establish public access.

As stated in the EA, providing outdoor recreation opportunities is a stated objective under the National Strategic Plan (NSP). The Angeles National Forest Land Management Plan (LMP) requires that the USFS adaptively mitigate for recreational uses where conflicts between sensitive resources and recreational use



exist. The LMP also states, as noted in the EA, that conservation education, perimeter control, and management presence should be implemented before resorting to redirection of use unless a stronger measure is immediately necessary. The Recreational Development Alternative jumps directly to redirection of use. Therefore, the Recreational Development Alternative is a very conservative alternative that implements the highest level of protection for the MYLF and meets the requirements of both the NSP and LMP. Given the sensitive nature of the MYLF, ACSD supports this redirection of use as proposed.

As stated in the EA, the indicator used to measure impacts to recreational opportunities is whether “permanent net loss of recreational opportunities are avoided.” The USFS recognizes that Williamson Rock is a unique climbing resource. Impacts to the MYLF associated with climbing can be mitigated through redirection of use. Impacts to other species, such as the peregrine falcon, can be mitigated through seasonal closures, as appropriate. Implementation of Alternative 4, resulting in permanent closure, would be too extreme, resulting in a permanent net loss of recreational opportunities and violating the NSP and LMP. The Recreational Development Alternative is a reasonable and conservative alternative that will protect sensitive resources while fulfilling the NSP and LMP directives to provide for recreational use. ACSD requests that the USFS implement the Recreational Development Alternative consistent with the NSP and LMP.

### **Mountain yellow-legged frog protection**

As stated in the EA, the MYLF is protected under the Endangered Species Act (ESA), which is administered by the U.S. Fish and Wildlife Service (FWS). In June 2010, ACSD discussed the Recreational Development Alternative with Jesse Bennett of the FWS Carlsbad Fish and Wildlife Office. He indicated that a recreational alternative, if reviewed by FWS, should include the following items: 1) a timeframe of actions to be implemented, 2) a map showing previously identified locations of MYLF tadpoles, 3) a monitoring timeline, scheduling both surveys and analyses that will evaluate the effects of the proposal, 4) protocols for reporting survey and analysis results to FWS, 5) a statement indicating intent to seek funding for additional surveys to locate other MYLF populations, and 6) a statement that the area would only be open for climbing from June 15 until weather no longer permits.

The Recreational Development Alternative should be adopted, addressing FWS concerns 1 through 5. This would allow for both recreational use and protection of the MYLF. Item 6 is not necessary since permanently redirecting climbing and access away from MYLF habitat, as proposed in the Recreational Development Alternative, will prevent rock climbing from impacting MYLF during critical life stages.

According to Dr. Roland A. Knapp, Research Biologist at the Sierra Nevada Aquatic Research laboratory, “[j]uvenile and adult mountain yellow-legged frogs are highly aquatic, and are rarely found more than a few hops from water.”<sup>1</sup> Therefore, by permanently redirecting use away from MYLF habitat, Williamson Rock can support both recreation and MYLF populations. ACSD and other climbing and recreational organizations are willing and able to advertise, encourage, and even informally enforce new recreational restrictions in order to ensure access to Williamson Rock is maintained.

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<sup>1</sup> <http://www.mylfrog.info/naturalhistory/lifecycle.html> (citing Vredenburg, V.T., G.M. Fellers, and C. Davidson. 2005. The mountain yellow-legged frog (*Rana muscosa*). Pages 563-566 in M.J. Lanoo, editor. Status and Conservation of U.S. Amphibians. University of California Press, Berkeley, California).



ACSD requests that the USFS work with FWS to develop and implement the Recreational Development Alternative in a manner that will protect MYLF and recreational uses.

However, the USFS should keep in mind that the FWS role is only advisory. FWS explicitly recognizes that the lead federal agency makes the final decision regarding ESA compliance.<sup>2</sup> Therefore, if FWS does not support the USFS' recreational mission on this issue, the USFS can still implement a recreational alternative as long as the best scientific data available is used to adequately protect the mountain yellow-legged frog. Please consider what likely constitutes the best science available on this issue: the expert opinion offered by Dr. Knapp during the November 18, 2010 conference with the USFS, USGS, FWS, FoWR, and ACSD at the USFS Arcadia office, and Dr. Knapp's separate comment letter regarding USFS Williamson Rock Critical Habitat Closure Environmental Assessment. This data—Dr. Knapp's analysis and comments, backed by his extensive research—supports the Recreational Development Alternative.

### **Monitoring**

ACSD supports monitoring for MYLF and other resources in conjunction with the implementation of the Recreational Development Alternative. Under the Recreational Development Alternative, climbing and other recreational uses in Williamson Rock will take place outside of MYLF habitat. Therefore, monitoring can proceed without interruption or impacts to the results. When analyzing the results of any Williamson Rock area monitoring, ACSD asks that the USFS take into account all impacts to the MYLF and other environmental resources. These impacts may include upstream or downstream use of the Pacific Crest Trail, runoff, and exotic species. Efforts should be made to address these additional impacts in order to protect the MYLF and other species within Williamson Rock.

### **Recovery plan for MYLF**

According to the species profile for the MYLF provided by the FWS, a recovery plan has not yet been developed for MYLF despite the fact that the species has been listed since 2002. It will be difficult to determine viability of the species without a recovery plan. ACSD is concerned that any determinations about the species status and viability may be arbitrary without an approved recovery plan for the species. ACSD asks that the USFS work with the FWS and other federal agencies to develop a recovery plan for the MYLF as soon as possible. In the interim, reasonable criteria to determine MYLF status should be determined prior to any monitoring. Please provide that criteria in the EA or allow interested groups, such as ACSD, to review the criteria once it is developed.

### **Peregrine Falcon**

As noted in the EA, the FWS removed the peregrine falcon from the ESA list in 1999. Although it retains protection under the Migratory Bird Treaty Act (MBTA), the species is only afforded protection from the specific acts defined in the statute, and only if the birds are actually present. EA referenced January 2001 Executive Order – “Responsibilities of Federal Agencies to Protect Migratory Birds” – does not elevate the MBTA to a vacant habitat or recreation use zoning statute. Please modify the EA to clarify that *seasonal protective measures* will only take place when peregrine falcons are present. ACSD volunteers have been trained in raptor detection within the Cleveland National Forest and would be happy to assist

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<sup>2</sup> 51 Federal Register 19926, 19928 (1986).



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with setting up a similar volunteer training program for the Angeles National Forest. As with the MYLF, ACSD is willing and able to advertise, encourage, and even informally enforce seasonal restrictions.

### **Other resources**

ACSD recognizes that Williamson Rock supports other environmental resources besides MYLF and peregrine falcon, including other wildlife, vegetation, and soils. ACSD believes that the Recreational Development Alternative can minimize impacts to all these resources. If recreational users are encouraged to stay on the trails, leave the area cleaner than they found it, and implement other basic but necessary outdoor environmental ethics, the natural environment of Williamson Rock should be well protected. ACSD advertises and encourages such environmental ethics in order to protect the natural habitat of climbing areas, such as Williamson Rock.

### **Implementation of multiple alternatives**

If the ANF ultimately implements its proposed 3-year, temporary closure, ACSD requests that every effort be made to implement the Recreational Development Alternative during or immediately after the closure without additional environmental analysis. Please modify the EA to state that if the Proposed Action Alternative is selected, the Recreational Development Alternative, fully analyzed in this EA, may be implemented without additional environmental analysis. Please develop criteria that would help the USFS make this determination. This will help save valuable time and scarce financial resources.

Under the Proposed Action Alternative, monitoring will be done during the three-year closure in order to determine the status of MYLF and other resources. The EA indicates that if MYLF “response has been insufficient at the end of three years” additional temporary closures or permanent closures may be considered. If the Proposed Action Alternative is selected, please provide criteria in the EA that would indicate an “insufficient response” for MYLF.

Thank you for the opportunity to provide comments on the EA for the Williamson Rock Critical Habitat Closure. If you have questions regarding comments in this letter please contact me at (619) 508-4665.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Brown".

Jeff Brown - Executive Director  
Allied Climbers of San Diego, Inc. [www.alliedclimbers.org](http://www.alliedclimbers.org)

Cc: Randy Moore, R5 Regional Forester  
Jody Noiron, Acting Forest Supervisor, Angeles National Forest  
Marty Dumpis, Deputy Forest Supervisor, Angeles National Forest  
Lisa Northrop, Forest Resources and Planning Officer, Angeles National Forest  
Troy Mayr, Friends of Williamson Rock Executive Director  
Jason Keith, Access Fund Policy Director