



December 12, 2014

Elizabeth L O'Neal  
SEPA Center  
P.O. Box 47015  
Olympia, WA 98504

**RE: Snoqualmie Corridor Recreation Plan & Rock Climbing - SEPA File No. 14-111901**

Dear Elizabeth L O'Neal, SEPA Center:

The undersigned climbing organizations respectfully submit comments regarding the draft Snoqualmie Corridor Recreation Plan as it relates to dispersed rock climbing opportunities. We appreciate the long history of collaboration with the South Puget Sound Region and look forward to continuing this partnership in support of high-quality, sustainable climbing access for decades to come.

**Climbing Organizations**

The Access Fund, American Alpine Club, The Mountaineers, Pro Guiding Service, and the Washington Climbers Coalition are national and Washington State-based climbing organizations dedicated to climbing access, conservation, and advocating for local climbers. Together, our organizations represent, educate, and mobilize over 20,000 climbers in Washington State. Each climbing organization has a long history of working with Washington State Department of Natural Resources (DNR) on climbing access at both Little Si and the Far Side (Exit 38). For example, Access Fund worked with DNR to complete trail projects at Little Si in 1995, 2001, and 2004. In the '80s and '90s, climbers were a key voice in making Little Si the popular destination it is today. More recently in August 2014, our organizations worked collectively with Mountains to Sound Greenway Trust and the Access Fund Conservation Team on restoration planning at the Far Side. For more information about our organizations, see [accessfund.org](http://accessfund.org), [americanalpineclub.org](http://americanalpineclub.org), [proguiding.com](http://proguiding.com), [mountaineers.org](http://mountaineers.org), and [washingtonclimbers.org](http://washingtonclimbers.org).

**The Climbing Resources**

Nearly half of established rock climbing routes in the Snoqualmie Corridor lie within DNR lands at Little Si (Mount Si NRCA) and the Far Side (Middle Fork Snoqualmie NRCA). The Far Side climbing area features approximately 200 climbs and is easily accessible from the existing new trailhead at Exit 38. Little Si, which features some of the most challenging rock climbs in the state, hosts another 183 climbing routes and is accessed from the popular existing trailhead.



Climbers display Discovery Passes at both trailheads, assisting with state infrastructure and services. Climbers start their hike on designated trails and disperse to the numerous sub-areas via undesigned approach trails. Alpine climbers regularly join the hiking community on the popular Mt Si and Mailbox Peak trails to enjoy their moderate mountain terrain.

### **The Draft Plan's Collaborative Process and Commitment to Recreation**

The climbing organizations appreciate the collaborative process that DNR initiated in 2012 with public meetings and the planning committee. We also hope the planning committee's site visit to the Far Side area on August 7, 2012<sup>1</sup> further illustrated the high value of rock climbing opportunities. In addition, the public survey informed DNR that approximately 27% of 2,486 respondents asked to see rock climbing provided on DNR-managed lands in the corridor. In terms of current recreational usage, climbing ranked nine out of 26 listed recreational activities amongst respondents.<sup>2</sup>

We thank the Project Team for recognizing dispersed rock climbing opportunities as a current and future recreation opportunity to provide in the Planning Area. Climbing is appropriately recognized as a recreational activity in the Mount Si NRCA (Little Si) and Middle Fork Snoqualmie NRCA (Far Side). The climbing organizations also support the objective to expand trail and parking opportunities in the vicinity of I-90, Exit 38, as this is the same trailhead used to access the Far Side. We look forward to collaborating with and assisting DNR in this project.

In terms of collaborating on stewardship of these climbing areas, the draft plan outlines a process for identifying and evaluating undesigned trails and can allow for trail work and restoration that restores resource damage and repairs areas that have compacted soils. The plan further recognizes the importance of partnerships with non-profit organizations and volunteer groups to educate visitors and engage in organized volunteer activities. Within this framework, the climbing organizations look forward to being a resource to DNR in assessing and stewarding these climbing areas.

In general, the draft plan illustrates that "DNR recognizes the diverse interests and values of the recreating public and the importance of connecting people with Washington's landscapes."<sup>3</sup> Thank you for your commitment to recreation in this region.

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<sup>1</sup> Washington State Department of Natural Resources. (November 2014). Snoqualmie Corridor Recreation Plan - DRAFT. Appendix C, Page 91.

<sup>2</sup> Washington State Department of Natural Resources. (October 2012). Snoqualmie Corridor Recreation Plan – Public Survey Report.

<sup>3</sup> Washington State Department of Natural Resources. (November 2014). Snoqualmie Corridor Recreation Plan - DRAFT. Page 20.



## Concerns and Suggestions on the Draft Plan

While the draft plan states it will provide dispersed rock climbing opportunities, it does not outline any objectives to improve these sites. There is a greater emphasis on improving hiking, mountain biking, and equestrian opportunities. If further details are not included in the plan, DNR may need to reference the draft plan's policy on adaptive management to consider future projects and account for the growing interest of rock climbing in the corridor.

In addition, the plan and DNR should consider the following suggestions:

- In Table 2, include rock climbing as a recreational activity accessed by the Exit 38 Trailhead in the Middle Fork Snoqualmie NRCA.<sup>4</sup>
- Evaluate critical access trails to popular climbing areas and where appropriate, consider designation or reroutes to make these undesignated trails more sustainable. It is important to note that climbing approaches require different standards compared to hiking, biking, and equestrian trails. A path may be more direct and ascend steeper terrain, yet it can be constructed in a sustainable manner that utilizes a smaller footprint, unique erosion prevention tactics, and hardening (such as rock steps). Trails built specifically for the intended purpose may help separate user groups and be more sustainable. In addition, this will help DNR meet Objective A for the entire Planning Area by maintaining separate use trails where appropriate.<sup>5</sup> We ask DNR to consider this in their evaluations and use the climbing organizations as a resource. For example, we can provide experts and experienced trail crews that specialize in sustainable climbing approaches and addressing erosion and resource damage at “staging areas”<sup>6</sup> at the base of cliffs and boulders.
- Recognize that rock climbing activities may be located in “low suitability”<sup>7</sup> areas due to the nature of climbing on cliffs. It is unclear in the plan how DNR will balance conservation and recreation in these areas. The climbing organizations have a wide range of experience with public land agencies across the country in applying best practices that balance climbing and the protection of sensitive plant species, wildlife, and natural resources.

<sup>4</sup> Washington State Department of Natural Resources. (November 2014). Snoqualmie Corridor Recreation Plan - DRAFT. Page 30.

<sup>5</sup> Washington State Department of Natural Resources. (November 2014). Snoqualmie Corridor Recreation Plan - DRAFT. Page 43.

<sup>6</sup> Staging areas in this reference is different than the definition in the draft plan. In reference to climbing, this is the area where climbers contain their climbing gear, and stand to belay or start their intended rock climbing route or boulder problem. Of all the zones used by climbing visitors, the staging area is typically the most heavily impacted. For further reference, see: Access Fund. (2008). Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan. <http://www.accessfund.org/cmp>.

<sup>7</sup> Washington State Department of Natural Resources. (November 2014). Snoqualmie Corridor Recreation Plan - DRAFT. Part IV – Planning Process, Page 69.



- Reference access to dispersed rock climbing opportunities under Phase II and Phase III of Table 5.<sup>8</sup> The objectives and implementation broadly outlines the plan to develop hiking trails and expand parking at the south end of the Middle Fork Snoqualmie NRCA near I-90, Exit 38, yet it should also reference rock climbing as it will be critical to maintain this access point.

### The Growth of Rock Climbing and Recreation in the Region

Collectively, the climbing organizations recognize the advantages and disadvantages of labeling rock climbing as dispersed recreation. Yet each year, more Washington citizens are participating in the activity of rock climbing. Dozens of residents are introduced to rock climbing every day via indoor climbing gyms, youth programs, and club-based activities in the greater Puget Sound region. While the climbing organizations have not executed user studies to calculate this growth at specific areas like Little Si and the Far Side, it is expected that these areas will see a growth in user days as climbing continues to grow in popularity.

In addition, the 2014 Governor’s Blue Ribbon Parks and Outdoor Recreation Task Force’s final recommendations call for “bold, transformational initiatives” to grow the outdoor recreation economy and support outdoor recreation opportunities.<sup>9</sup>

With this growth comes challenges. The climbing organizations recognize that climbing, like any recreational activity, has an impact on natural resources and management of public lands. In addition to providing recreational access, our missions place an equal emphasis on protecting the environment in which we enjoy and recreate on. Therefore, we hope DNR considers our organizations a resource for stewardship and not just another user group to manage. The draft plan is a step in the right direction, but may not go far enough in addressing this growth and need to concurrently manage impacts.

As DNR finalizes and implements the Snoqualmie Corridor Recreation Plan, please reach out to the climbing organizations for assistance with:

- **Education and outreach:** The climbing organizations can reach out to the climbing community regarding important updates, planning processes, rules, and Leave No Trace practices on DNR lands via email, social media, meetings, courses, programs, and events. We can also provide assistance in messaging and language for trailhead kiosks and trail signage to educate climbers in the field.

<sup>8</sup> Washington State Department of Natural Resources. (November 2014). Snoqualmie Corridor Recreation Plan - DRAFT. Page 54.

<sup>9</sup> Parks and Outdoor Recreation Task Force (September 2014). Final Recommendations to the Governor.



- **Stewardship and restoration:** Expert trail crews, leaders, and volunteers can be mobilized to assist DNR, Mountains to Sound Greenway Trust, and Washington Trails Association with trail projects, assessments, and restoration. For example, the Access Fund Conservation Team can be available in June 2015 for stewardship work at the Far Side.
- **Planning and climbing management:** The climbing organizations have access to best practices and examples of successful climbing management here in Washington and across the U.S. For examples, visit [www.climbingmanagement.org](http://www.climbingmanagement.org).
- **Funding and support:** Where matching funds are necessary to complete climbing-related stewardship or improvement projects, reach out to the climbing organizations for fundraising assistance or letters of support. For example, the climbing organizations raised \$50,000 for toilet facilities at the popular climbing and camping area at Frenchman Coulee in Central Washington in partnership with Washington Department of Fish and Wildlife. In addition, consider small matching grants from the Access Fund or the American Alpine Club.<sup>10</sup>

Thank you for the opportunity to comment on the draft Snoqualmie Corridor Recreation Plan through the SEPA review process. We look forward to actively partnering with DNR on the implementation of this plan in an effort to support high-quality, sustainable rock climbing opportunities.

Sincerely,

Joe Sambataro  
Northwest Regional Director  
Access Fund

Martin Volken  
Owner & Founder  
Pro Guiding Service

Eddie Espinosa  
Northwest Regional Manager  
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Kurt Hicks  
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Cc: Sam Jarrett, DNR South Puget Sound Region Recreation Manager  
Brock Milliern, Assistant Division Manager – Statewide Recreation Program Manager  
Tor Bell, Mountains to Sound Greenway Stewardship Director  
Andrea Imler, Washington Trails Association Advocacy Director  
Ty Tyler, Access Fund Stewardship Director

<sup>10</sup> Access Fund Grant Program: [www.accessfund.org/grants](http://www.accessfund.org/grants); American Alpine Club Cornerstone Conservation Grant: [www.americanalpineclub.org/grants/g/16/AAC-Cornerstone-Conservation-Grant](http://www.americanalpineclub.org/grants/g/16/AAC-Cornerstone-Conservation-Grant).