

April 7, 2006

Wallace Keck, Superintendent
City of Rocks National Reserve
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**RE: Access Fund Scoping Comments to the City of Rocks
Climbing Management Plan Revision**

Dear Wallace:

I write today on behalf of the Access Fund and American climbing community to urge the National Park Service (NPS) to expand the issues to be addressed in the planned City of Rocks (CIRO) climbing management plan (CMP) revision. In particular, the projected scope of the CMP revision fails to address the most controversial climbing management issue at CIRO: the climbing ban on the Twin Sisters. If, as the NPS states, the purpose of this revision is to determine whether it is implementing best management practices for climbing at CIRO, the NPS must provide an analysis of an alternative that provides some climbing opportunities at Twin Sisters. This analysis, despite the view of a few regional NPS staff, would be consistent with the NPS mandate, the CIRO enabling statute, and current (and up for review) NPS management policies. We are very disappointed that the NPS has already made up its mind to continue the Twin Sisters climbing ban and exclude the public from this important management planning decision.

Perhaps the strongest indictment against the CIRO planning to date is the NPS's continued support for the Twin Sisters ban even though climbing "impacts can neither be demonstrated nor articulated" – this is hardly consistent with Congressional intent for the CIRO reserve, nor the NPS's own mission, management policies and regulations that emphasize both preservation *and* enjoyment.

To neglect the Twin Sisters issue altogether, and continue an exclusive and unnecessary management practice, would underscore the arguments of those who claim that the NPS management policies should be amended in a way that prevents NPS staff from implementing an unreasonably protective approaches when balancing resource protection and recreation. Public advocacy groups like the Access Fund support the reasonable implementation of existing NPS

policies that favor consistent and effective resource protection, but arbitrary actions such as the Twin Sisters ban only support those who want to reduce the authority of the NPS to protect cultural and natural resources.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rock climbers and mountaineers nation-wide. Idaho is one our largest member states and many of our members and affiliates climb at the City of Rocks.

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 closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment. The Access Fund has a proud record of collaboration with the NPS and Idaho Department of Parks and Recreation (IDPR) concerning climbing management issues at CIRO and adjacent Castle Rocks State Park where we were instrumental in providing funding for the acquisition of that park and developing climbing management practices.

The Access Fund has long supported the efforts of the NPS to fulfill their mission during management planning initiatives and we have recently provided comments to the proposal to amend NPS management policies. These comments can be found at: <http://accessfund.org/pdf/dmp05.pdf>.

The Twin Sisters Have Long Been Important and Popular to Climbers

Despite NPS assertions to the contrary, the Twin Sisters was a popular climb and received much climbing traffic prior to the climbing ban. Since the 1960s, many long-time City of Rocks climbers from Idaho and around the country—even internationally—traveled to the City of Rocks and specifically targeted challenging climbing adventures on the Twin Sisters. Accordingly, it is puzzling that recent NPS statements challenge whether Twin Sisters was actually important to the climbing community, claiming that

the formation was never “considered enormously popular with the general visitor engaged in climbing at CIRO.”¹ This characterization is both incorrect and inappropriate.

With its multi-pitch high-quality routes, the climbing on Twin Sisters is both unique and, prior to the ban, very popular.² The NPS’s own climber registration system showed that in 1993 alone, for just the four months of July through October, 158 parties totaling 383 climbers, registered to climb at the Twin Sisters. These climbers came from at least 18 states and four foreign countries. It’s likely that for the entire year over 1,000 climbers visited the Twin Sisters. There exist at least two routes on the North Sister (AKA “The Eberhorn”) that are unequaled in length and quality anywhere else in the Reserve. It is indicative of their bias that out-of-state historical preservation professionals (with likely no personal experience climbing on the Twin Sisters) would make public uninformed assertions minimizing the significance and popularity of climbing on Twin Sisters. According to City of Rocks climbing guidebook writer Dave Bingham, “Over one hundred climbing routes have been done on the Sisters and surrounding outcrops, including some of the longest and best quality routes at the City of Rocks.” A few of these unique multi-pitch classics, including *The Balcony Route*³ and *The Lowe Route*, are naturally protected with removable climbing devices and were first climbed in the 1960s, making them historic resources in their own right.

A number of qualities make climbing on the Twin Sisters a unique experience at the City of Rocks. These spires are the largest, free-standing spires in the area and have the highest elevation summits offering the best views of any formation at CIRO. These easily accessible towers can be reached by adventurous hikers without technical climbing gear, but also offer a variety of routes spanning all levels of difficulty requiring a variety of climbing techniques, a dramatic setting, and easy descent. In short, the Twin Sisters are significant climbing resources at CIRO that were very popular and important to climbers prior to the ban.

The Basis for the Twin Sisters Climbing Ban is not Supported by NPS Resource Studies

During the planning process that led to the initial Twin Sisters closure in the mid-1990s, a tension prevailed between local land managers at the City of Rocks who saw no

¹ Climbing Management Plan Internal Review Official Minutes and Recommendations January 18-19, 2006, at p. 8 (hereafter, “Minutes”).

² I know this first-hand, as I often traveled here in the 1980s from Wyoming to climb at the City of Rocks. The Twin Sisters were considered by many to have the highest quality routes in a unique multi-pitch setting.

³ Guidebook writer Dave Bingham notes that The Balcony Route is “*the* classic, three pitch crack route at the City”

justification for the absolute climbing ban, and the distant Seattle-based resource management staff who then, as now, assert their subjective analysis supporting a ban that is not rooted in governing law or NPS management policy. Indeed, a formal Twin Sisters Resource Study conducted by local City of Rocks NPS staff, at the direction of the NPS regional director, found “no definable impacts” to support a conclusion that “the significant cultural and natural character of Twin Sisters warrants prohibition or restriction of rock climbing.” To the contrary, that study found that “climbing activities and associated impacts do not directly or indirectly threaten the National Natural Landmark or National Historic Landmark⁴ qualities of Twin Sisters. With no indication of a threat to those qualities, closure would be inappropriate.” The NPS found that climbing on Twin Sisters would have no impact on the geology, vegetation, or wildlife found at Twin Sisters. Furthermore, no user conflicts had been reported associated with climbing, and NPS staff could not even detect visual, audible and social impacts at Twin Sisters related to climbing, even when intentionally viewing the rock looking for climbers. Importantly, the NPS study found that climbers do not interfere with any relevant view of Twin Sisters related to historical preservation. Accordingly, the NPS study concluded that there was no need to permanently close the formation to climbing, and instead suggested that temporary closures or use limits would be more appropriate only when “visitor activities might conflict with specific historic interpretive events.” While regional NPS staff ignored its own recommendation, The Access Fund continues to support this more reasonable management alternative.

After over 25 years of active climbing on the Twin Sisters,⁵ in 1998 the NPS finalized its CIRO CMP that banned climbing on the Twin Sisters. This action resulted in a lawsuit brought by the Access Fund challenging the NPS planning process. Co-plaintiffs in this

⁴ National Historic Landmarks (NHL) are buildings, sites, districts, structures, and objects that have been determined by the Secretary of the Interior to be nationally significant in American history and culture. NHL properties included in the National Register of Historic Places have been judged by the Secretary of the Interior to have "national significance in American history, archeology, architecture, engineering and culture." It is important to note that NHL's do not require exclusive management for historic values where those values would not be impaired by other uses such as recreation. Indeed, recreation is allowed within the Mount Rainier and Pikes Peak NHLs, and when the NPS at Devils Tower in Wyoming were considering nominating that famous “iconic” landmark for NHL status, they explicitly intended that recreational climbing could continue despite any NHL designation. For other political reasons, that NHL process at Devils Tower has been shelved.

⁵ In fact, some speculate that Shoshone Indians and 19th Century pioneers scaled the Twin Sisters. The NPS has even determined that it is reasonable to assume that pioneers, cattlemen, and Native Americans over the preceding centuries may have climbed one or both the Twin Sisters because they are much higher than the surrounding rocks and offer clear views in all directions. Thus, the NPS has stated that “pioneers using the California Trail were probably the City’s first non-Indian climbers.” Accordingly, climbing on the Twin Sisters is actually an integral part of its history and this should be recognized by the NPS when managing the area for climbing.

lawsuit included Greg Lowe, founder of Lowe Alpine Systems and regular first-ascentionist at CIRO, and former Salt Lake City mayor Ted Wilson. In 2000 a federal magistrate rejected the Access Fund's arguments that the ban was arbitrary and capricious, based largely on the statements of NPS historic preservation staff in the record.⁶

In 2004, the entire Idaho Congressional delegation signed a letter to NPS Director Fran Mainella urging her

to ease the absolute climbing ban on the Twin Sisters . . . and implement a multiple-use management approach providing for low impact climbing activities consistent with NPS policies.

The NPS responded that it intended to amend the Comprehensive Management plan at CIRO to, in part,

evaluate if the decision to ban climbing on the Twin Sisters remains valid

This plan amendment would proceed

*within the framework of a public planning process with full opportunities for public review and comment on proposed actions [and] guarantee[d] that all interested parties will be consulted and given every opportunity to provide comment and input to the process.*⁷

Astonishingly, the NPS disregarded both the wishes of the Idaho delegation as well as their own promise to provide a "full opportunity for public review" of the Twin Sisters ban. This shows the powerful influence that a few NPS staff members have had and continue to have on the decision-making process for City of Rocks.

Although the public is allowed to provide these scoping comments to the CMP revision, the NPS has already made up its mind to exclude the Twin Sisters issue from the CMP process and maintain the ban even while admitting that climbing "impacts can neither be demonstrated nor articulated."⁸ The Access Fund and the overwhelming majority of the

⁶ Not surprisingly, the federal magistrate who ruled against the Access Fund refused our request to have a ranger stand on the summit of the nearest Sister when he went to see it from the historic trail. Had he done so, he too would have had to acknowledge that there was no tangible impact from people on the formation when viewed from the trail. This is the type of decision-making the NPS now touts to support the continued closure.

⁷ Minutes at p. 1.

⁸ Minutes at p. 8.

extensive Idaho climbing community are stunned by the NPS’s refusal to even analyze whether the absolute climbing ban at Twin Sisters is still necessary. As we’ve noted since the beginning of this issue, there are many management alternatives that could provide some level of climbing opportunity on the Sisters without impacting the experiences of visiting historical enthusiasts. The NPS’s unwillingness to consider these obvious alternatives is contrary to Congressional intent when establishing the Reserve, which includes managing recreation as part of its mandate.

The NPS’s Intent To Ignore the Twin Sisters in its CIRO CMP Revision Violates the Organic Act and NPS Management Policies

The NPS management actions at Twin Sisters are not consistent with the laws and policies that govern the park resource at City of Rocks. While the NPS’s general mandate is to “conserve the scenery [of park lands] and the natural and historic objects and the wild life therein” it also requires the agency to “*provide for the enjoyment of the same* in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.” While the NPS at CIRO emphasizes historic preservation, it ignores several compromises that could equally fulfill its *enjoyment* mandate.

The NPS’s specific mandate for City of Rocks is “to preserve and protect the significant historical and cultural resources; to manage recreational use; to protect and maintain scenic quality; and to interpret the nationally significant values of the reserve.”⁹ Nowhere in the City of Rocks enabling statute did Congress say that historical preservation and recreation are mutually exclusive, and cannot under any circumstance, be allowed to co-exist on Twin Sisters. It is illogical to think that a visiting historian—who knew that climbing on the formation took place in November when no wagon trains historically passed through the region—could have an impaired “feeling and association” while looking at the formation in August. The NPS must do a better job when interpreting the enabling statute for City of Rocks. If Congress meant that Twin Sisters should only be a museum piece viewed from a distance it would have said so specifically. Rather, Congress clearly directed the NPS to manage the City of Rocks for a number of values: historical/cultural resource protection, recreation, scenic quality, and national significance interpretation.

With the Twin Sisters ban the NPS ignores its own regulations and policies that clearly limit total closures of public resources without specific scientific research and objective evidence of their necessity.¹⁰ The determined need for the Twin Sisters closure resulted neither from scientific data nor objective analysis; instead, the ban disregarded the one scientific assessment involved in this decision, The Twin Sisters Resource Study, and

⁹ 16 U.S.C. § 460yy(a).

¹⁰ NPS Management Policies 8.2 Visitor Use.

was based exclusively on the subjective “feeling and association” of a handful of NPS staff and historical enthusiasts. Indeed, the views of both the recreation community and even several NPS staff (some of whom prepared the Resource Study finding no climbing impacts) were ignored by NPS planners in favor of the subjective views of their historical preservation staff. NPS policies require that any “restrictions on recreational use will be *limited to the minimum necessary* to protect park resources and values and to promote visitor safety and enjoyment.”¹¹ The Twin Sisters ban is clearly not the minimum necessary to protect park resources; many reasonable alternatives exist and should be explored in the plan update.

Current management policies also require the NPS to “encourage recreational activities that are consistent with applicable legislation, that promote visitor enjoyment of park resources through a direct association or relation to those resources, and that are also consistent with the protection of resources, and that are compatible with other visitor uses.”¹² Instead, the Twin Sisters have been made into a museum exhibit that can only be enjoyed from a distance instead of a shared resource that climbers might enjoy through a direct association to the physical resource.

Finally, the climbing ban at the Twin Sisters violates National Park Service regulations that require NPS officials, when implementing park closures or public use restrictions, to set forth reasons why “less restrictive measures will not suffice.”¹³ This mandate has the force of law which the NPS has chosen to violate. The NPS has made no effort to explain why climbing could not occur on the Twin Sisters (1) even during times when historically there had been few or no wagon trains through the region, or (2) when currently there are few historical enthusiasts that visit the area. Importantly, the same NPS regulations set out procedures for terminating restrictions and public use limits or closures when “no longer necessary” upon a finding that the “termination will not adversely impact park resources.” The absolute Twin Sisters climbing ban is no longer necessary because allowing climbing opportunities there will not adversely impact park resources or the visitor experience at the City of Rocks. A closer look at the planning process to date reveals the subjective analysis of NPS planners and explains the stubborn desire to keep Twin Sisters under lock and key.

Recent NPS Twin Sisters Planning Excluded the Public and Violated Several Federal Laws and Policies

The NPS response letter to the Idaho Congressional delegation promised “full opportunities for public review” and that the “public consultation process will be

¹¹ NPS Management Policies 8.2.2 Recreational Activities.

¹² NPS Management Policies 8.2 Visitor Use.

¹³ 36 C.F.R. 1.5.

thorough and lengthy.” However, the NPS clearly does not intend such full public opportunities.

In January 2006 the NPS conducted an internal climbing management plan review and subsequently published official minutes and recommendations. This meeting’s primary purpose was to follow through on a recommendation in the 1998 Plan which

acknowledged that the Climbing Management Plan is a dynamic document. Rock climbing use is changing at City of Rocks, and the plan must also reflect changing conditions. From time to time it may be necessary for Reserve managers to make minor changes or adjustments in the plan. Periodically, at least every five years, the plan should be carefully reviewed by an interdisciplinary team composed of both resource and recreation specialists, and revisions made to the plan where warranted.

Yet behind closed doors NPS staff determined that, despite assurances that the public could be included during the scoping process, the Twin Sisters issue was completely off the table due to “the primary purpose of protecting cultural resources as stated in the enabling legislation.” NPS staff also characterized climbing as an “optional and inappropriate” use of the Reserve.¹⁴ Again, the NPS provides no evidence that Congress ever intended climbing to be optional or inappropriate when establishing the Reserve.

The NPS decided that there was no “compelling reason to entertain a compromise or alternative that was anything less than a total ban on recreational climbing on the Twin Sisters” even though they also found that climbing impacts on the Twin Sisters could not be demonstrated nor even articulated. Climbers were systematically excluded, as there were from the initial decision to ban climbing, from the latest process of consultation as directed by the National Historic Preservation Act, which requires consultation with all “interested parties.” The Access Fund has long been an interested party at CIRO, yet it received no notification of any consultations regarding the historic values driving the latest decision to uphold the Twin Sisters climbing ban. Rather, a private meeting dominated by NPS historical preservation officials convened and agreed to continue the Twin Sisters ban based on their one-sided perception that one exclusive use should dominate a multi-use public land unit. Climbers’ exclusion here was especially important

¹⁴ NPS staff personal bias against climbing is also evidenced by the complete disregard for other forms of visual impact in the area. For example, there are developed campsites, a graded roadway, power lines, automobile traffic, a private house, and a concrete latrine in the visual landscape of the Twin Sisters. These modern improvements have far more visual impact than the occasional climber on the rock, yet these impacts are not considered inappropriate.

given the Access Fund's history of advocating for reasonable management at Twin Sisters. This is a direct violation of federal law.

The NPS's Narrow Scope of Analysis for the CIRO CMP Revision Violates NEPA

When preparing a National Environmental Policy Act (NEPA) planning document like the current CIRO CMP revision, the NPS must include all reasonable alternatives to the proposed action. The stated purpose for revising the 1998 CIRO CMP is “to incorporate new operational procedures and best management practices since the plan was approved eight years ago” and “to address a number of critical issues at the Reserve [including whether] the decision to ban climbing on the Twin Sisters remains valid from a recreational and resource stewardship perspective.” Given this purpose for proposing a CMP revision, it makes no sense that the most questionable and controversial management practice (the Twin Sisters climbing ban) would be ignored.

NEPA planning documents serve two purposes: (1) to ensure informed decision making by federal agencies, and (2) to provide the public with information and an opportunity to comment on the proposed action. Further, NEPA plans must contribute to the decision making process and not be used to rationalize or justify existing decisions.¹⁵ Importantly, and agency must “study, develop and describe alternatives to recommended courses of action in any proposal, [especially those] that involve conflicts concerning alternative uses of available resources.”¹⁶ NEPA regulations require “a reasonable range”¹⁷ of alternatives that provide the public an opportunity to support or criticize a proposed project; and the agency must “rigorously explore and objectively evaluate all reasonable alternatives.”¹⁸ At CIRO, the NPS has failed to consider any possible alternatives for the CMP revision other than its desired outcome, and instead has simply regurgitated its past arguments to justify a continued climbing ban at Twin Sisters. This narrow planning scope does not provide any insight into whether the Twin Sisters climbing ban is in fact a best management practice.

The NPS at CIRO has stated that it will include only a “no action” alternative and a preferred alternative that includes 13 recommended changes to the CIRO CMP, but which fails to address the Twin Sisters issue. Even if the NPS really did believe that looking at the Twin Sisters ban potentially conflicts with its management policy, which we dispute, this is a highly contested point and thus it is in fact reasonable—even primary to the process itself—for the NPS to include an alternative analyzing an easing of the Twin Sisters climbing ban. Accordingly, NEPA regulations require the NPS to expand

¹⁵ 40 CFR 1502.5.

¹⁶ 42 USCA 4332(E).

¹⁷ 40 CFR.1505.1(e)

¹⁸ 40 CFR 1502.14(a).

its range of alternatives for the planned CIRO CMP, and include an alternative analyzing the Twin Sisters climbing issue. Anything less than this would constitute an unreasonably narrow range of planning alternatives and result in a violation of NEPA.

Many Reasonable Compromises Exist for Managing Climbing that will Preserve Historic Values at Twin Sisters

Several possible solutions for compromise at the City of Rocks could balance NPS management of climbing at the Twin Sisters and the protection of historic resources. There are many examples across the country where climbing co-exists with protective measures that ensure cultural resource protection. Thus, it is unnecessary for the NPS to manage the Twin Sisters exclusively for cultural protection.

Although the NPS feels that the Twin Sisters are the “iconic” visual feature for the City of Rocks National Reserve, and use this subjective determination to justify why it must absolutely exclude climbers, this reasoning is not consistent with other public land management plans across the country—including many NPS plans—that seek primarily to protect cultural resources. Mount Rainier National Park’s National Historic Landmark zone allows mountaineering and the NPS at Devils Tower just last year proposed NHL status for that “iconic” natural feature yet no added climbing restrictions were proposed to accompany the NHL proposal.¹⁹ The NHL atop the USFS’s Pikes Peak allows recreation as well. Many other significant cultural sites across the country seek ways to mitigate conflicts rather than establishing exclusive reserves for one interested party such as is the case at CIRO. The Red River Gorge in Kentucky allows climbing immediately adjacent to cultural sites that are off-limits to climbing (and the Access Fund has provided grants to the US Forest Service to protect these important cultural sites).

Another example is Sunset Rock near Chattanooga, Tennessee where the NPS allows climbing despite the area being a National Military Park and the park’s primary purpose being historic battlefield preservation.²⁰ Hundreds of other public land units manage low-impact recreation with other important resource conservation efforts such as raptor nesting and cultural resource site protection. The Access Fund supports these reasonable efforts to balance recreation and resource protection; see our website for current listings notifying climbers of these closures.²¹

¹⁹ As noted, the proposed “Bear Lodge National Historic Landmark” has been shelved for other political concerns unrelated to any perceived recreation-cultural resource conflicts.

²⁰ The National Park Service manages climbing at Chickamauga and Chattanooga National Military Park (CHCH) to protect park resources and the quality of the visitor experience. The primary objective of climbing management is to preserve and protect the cultural and natural resources of the park. A secondary objective is to provide high quality experiences for visitors, including climbers. See <http://www.nps.gov/chch/cmp/finalcmp.htm>

²¹ <http://accessfund.org/access/index.php>

In their Meeting Minutes, the NPS staff failed to answer the following question posed by the CIRO Supervisor, “Are the alternatives to a total climbing ban on Twin Sisters worth another review and consideration?” It is important that the NPS at least attempt to investigate alternatives and look at possible solutions for Twin Sisters that have been suggested since before CIRO’s 1995 Draft Climbing Management Plan. Alternatives worthy of analysis include the following:

- Climbing on Twin Sisters only on weekdays when there is little visitation, and temporarily prohibiting it during historic commemorative events.
- Climbing on Twin Sisters only by permit as determined by the Superintendent.
- Climbing on only a selection of North Sister routes between October 1 and April 30 and closing it for the remaining period so as to not conflict with the normal time period for historical appreciation.
- Limiting climbing to even-numbered calendar days so that both climbers and historical enthusiasts can be assured of an opportunity to experience the Twin Sisters without any chance of conflict, especially on weekends.
- Even issuing only one permit per day (to no more than four persons) on a trial basis to determine if “feeling and association” was indeed impacted. This could be done seasonally as well.

The Access Fund supports an analysis that includes these obvious and reasonable compromises that provide some climbing opportunities but also ensure the continued protection of the historical values at Twin Sisters.

Conclusion

The NPS’s absolute climbing ban at Twin Sisters is unreasonable and unnecessary. Moreover, no statute, regulation, policy or guideline directs the NPS to prohibit otherwise legitimate climbing on the Twin Sisters, and there is no evidence that climbing is incompatible with the history of the Twin Sisters.

To date, at Twin Sisters the NPS has improperly allowed a historical preservation emphasis to overshadow the multi-use mandate of CIRO, failing to adequately weigh the perspective of persons with recreational expertise when considering whether a compromise is appropriate for managing Twin Sisters. The predictable result is an arbitrary and capricious use restriction that completely ends all climbing at Twin Sisters

for all citizens and foreign visitors, 365 days a year, on the entirety of the formation, without regard to whether climbers would literally be invisible, imperceptible and unknown to any persons attempting to “experience” the historical “feeling and association” related to the California Trail. Continuing this extreme plan, and failing to even consider reasonable compromise alternatives, violates CIRO multi-use enabling mandate, the NPS mission, NPS management policies, NPS management regulations, basic common sense, and the expressed wish of the entire Idaho Congressional delegation.

To fulfill its duty, the NPS must put aside the subjective perspective of its historic preservation staff, and revisit the Reserve’s enabling language, which directs the agency to manage the area for recreation, as well as its own management polices, which require less restrictive measures than this absolute climbing ban at Twin Sisters.

Sincerely,

Jason Keith
Policy Director
The Access Fund

Cc: US Senator Larry Craig
US Senator Mike Crapo
US Representative Mike Simpson
US Representative “Butch” Otter
National Park Service Director Fran Mainella
Boise Climbers Alliance
Salt Lake Climbers Alliance
Steve Matous, Access Fund Executive Director
Access Fund Board of Directors
American Alpine Club