

September 29, 2010

North Cascades National Park
c/o Chip Jenkins
810 State Route 20
Sedro-Wooley, WA 98284-1239
noca_superintendent@nps.gov

Re: Washington Climbers Coalition and Access Fund Comments Regarding Ross Lake National Recreation Area General Management Plan

The Washington Climbers Coalition and the Access Fund

The Washington Climbers Coalition (WCC) and the Access Fund welcome the opportunity to provide comments on the preliminary alternatives for the Ross Lake National Recreation Area (NRA) General Management Plan (GMP). Please consider these comments when planning for climbing at the Ross Lake NRA and feel free to contact us anytime for assistance and information regarding established best management practices for climbing used on public and private lands throughout the country.

The Washington Climbers Coalition (WCC, www.washingtonclimbers.org) is a non-profit corporation focused on issues affecting rock climbing, ice climbing, and mountaineering in Washington State. The WCC is affiliated with the Access Fund (www.accessfund.org), a national climbing organization. The WCC's mission is to engage climbers and land managers in discussion of issues related to climbing area management and access, to encourage active involvement in coordinated efforts to preserve our crags and to maintain good relations with other recreational users and land managers or owners.

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and to conserve the climbing environment. A 501(c)(3) non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 10,000 members and affiliates. The Access Fund assists land management agencies around the country with climbing management issues. The Access Fund has an MOU with the National Park Service

(www.accessfund.org/mous) and Washington is one of the Access Fund's largest member states.

Climbing in the Ross Lake NRA

Since the early 20th Century, climbers have sought out the alpine challenges of the North Cascades, including those in what is now the Ross Lake NRA. More recently, climbers have discovered the excellent sport climbing the area offers. Many members of the WCC and Access Fund climb and live in Washington and have a direct interest in recreational access at the Ross Lake NRA. The Access Fund and WCC have a long history of cooperative assistance with the National Park Service (NPS) in the Ross Lake NRA. Prior to 2002, climbers began establishing rock climbing and bouldering routes in the Skagit Gorge. Due to concerns regarding bouldering in potentially sensitive areas and to give the NPS the opportunity to develop and implement a climbing management plan for the NRA, climbers agreed to a voluntary moratorium on establishing new climbing and bouldering routes in 2002. Climbers agreed to this voluntary moratorium with the understanding that a climbing management plan would be implemented within 2 years.

Since 2002, WCC and the Access Fund helped ensure climbers respected the moratorium, all the while working cooperatively with the NPS to negotiate an agreement that would allow new climbing in new areas while respecting the unique cultural and natural resources of the NRA. In 2008, we finalized the Newhalem Climbing Agreement (attached hereto) with the NPS to establish four areas in which new climbing routes could be established during the pendency of the current GMP. In addition, we hosted an Adopt-a-Crag event in conjunction with the NPS, Washington Trails Association, the Vertical World Junior Climbing Team, and The Wilderness Society to build a new trail to an established climbing area that enhances access and minimizes impact. We continue to communicate with the climbing community, other organizations and NPS personnel to explore cooperative ways in which the Access Fund and WCC can support our mission of climbing access and conservation at the Ross Lake NRA.

When considering the scope of the GMP, the NPS should consider how it could build further on the successful relationship that the agency has with the climbing community, in particular the WCC and the Access Fund, to ensure future access and conservation in the Ross Lake NRA. When considering the scope of the GMP, the NPS should also consider specific climbing provisions or even a stand-alone climbing management plan. The Access Fund is the leader in compiling climbing management plan information and documenting "climbing management practices that work." See our recent publication "Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan." The second edition of this 72-page booklet is available for free on our website at <http://www.accessfund.org/pdf/CM-web.pdf>. In addition, the Access Fund regularly hosts and organizes Climbing Management Summits that attract dozens of federal and state land managers from across the country, including one in October that a North Cascades National Park ranger will attend.

In designing the GMP, we encourage the NPS to strive to manage for the fact that the climbing in Ross Lake NRA provides the public with unique recreation opportunities, which should be preserved. For this reason the WCC and the Access Fund generally support

preliminary Alternative B because it appears to allow for future exploration and establishment of new routes and climbing areas beyond the four currently established areas.

From our review of the Ross Lake GMP Newsletter #3, Volume I, Chapter 4 of the Draft GMP/EIS and conversations with NPS personnel, we understand that Alternative B would automatically establish the existing four areas as “Climbing Management Areas” and would allow continued use and exploration of those areas as contemplated in the 2008 Newhalem Climbing Agreement. In addition, Alternative B allows for the possibility that future areas could be opened to sport climbing throughout the Ross Lake NRA.¹ The WCC, the Access Fund and all the climbers they represent are very excited about the potential to enjoy new sport climbing crags throughout this spectacular area.

We ask, however, that the NPS provide clarification with respect to the geographic scope and operational details of Alternative B. With respect to geographic scope, although the GMP addresses the Ross Lake NRA as a whole, Volume I, Chapter 4 of the Draft GMP/EIS specifically refers only to the Skagit Gorge in discussing sport climbing. It is our understanding and hope that this alternative includes the potential for establishing Climbing Management Areas in other zones throughout the NRA. As it appears from the NPS maps that some of the existing climbing areas are in zones other than that designated the “Skagit River Zone,” it appears that the GMP contemplates that “Climbing Management Areas” will not be restricted to the Skagit River Zone. Clarification on this point would help us explain to climbers in the future just which areas could potentially be explored for new climbing opportunities and would avoid misunderstandings about where new sport climbing areas will and will not be allowed.

With respect to the operational details, we seek clarification on the process for establishing new Climbing Management Areas. To whom would we address requests for review of potential new Climbing Management Areas? When could such reviews take place? How long would the approval process take? We are very aware of the budgetary limitations of the NPS and the many other duties of its personnel that could make it difficult to prioritize reviewing new proposals for climbing areas. We would like to establish a review process that would minimize the impact on NPS resources and facilitate speedy approval of suitable new areas. We would be happy to provide resources and expertise as needed to do just that.

It is the WCC’s and Access Fund’s experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions, including rerouting of trails or crag access advisories. The Access Fund’s grant program regularly provides funding for management initiatives that raise awareness about climber responsibilities and agency management obligations. Examples of conservation grants that the Access Fund regularly awards to maintain climbing access and preserve the climbing environment include:

- Boise Climbers Alliance, Black Cliffs, ID – cliff nesting raptor signage & brochure.
- Colorado Division of Wildlife, Boulder Canyon, CO – cliff nesting raptor signage.
- Joshua Tree National Park, CA – vegetation surveys, and GPS location of climbing areas

¹ Sport climbing is generally defined as rock climbing on cliff faces where fixed anchors, such as bolts, have been preplaced to enable climbers to more safely ascend rock faces that are not protectable with removable anchors.

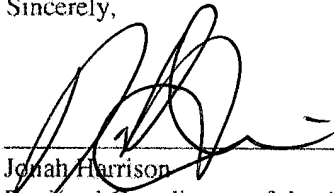
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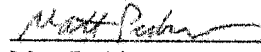
- Boise Climbers Alliance, Black Cliffs, ID – cliff nesting raptor signage & brochure.
- Colorado Division of Wildlife, Boulder Canyon, CO – cliff nesting raptor signage.
- Joshua Tree National Park, CA – vegetation surveys, and GPS location of climbing areas in relation to Threatened & Endangered species sites.
- North Carolina Wildlife Resources Commission, NC – peregrine falcon monitoring and outreach.

The Access Fund and the climbing community have an exemplary record with regard to supporting natural resource protection. In general, climbers are strong supporters of open space and conservation, have a vested interest in protecting the environment, and understand the balance between conservation and access. When formalizing the GMP alternatives at Ross Lake NRA, the WCC and the Access Fund urge the NPS to reaffirm the positive role that climbing has traditionally had at the NRA, to ensure that current climbing access and the climbing opportunities are maintained intact and that future opportunities for new Climbing Management Areas are prioritized.

If you have any questions or concerns please feel free to contact either representative below.

Sincerely,


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