

December 4, 2003

Superintendent Bill Paleck  
North Cascades National Park Service Complex  
810 State Route 20  
Sedro-Woolley, WA 98284

**Re: Access Fund Scoping Comments to Frontcountry Climbing  
Environmental Assessment and Management Plan for the Ross Lake  
National Recreation Area**

Dear Superintendent Paleck:

The Access Fund welcomes this opportunity to provide scoping comments to the Frontcountry Climbing Environmental Assessment and Management Plan for the Ross Lake National Recreation Area (Ross Lake NRA CMP), and applauds this effort to provide reasonable and effective management direction for climbing opportunities within the Skagit Rover Gorge (SRG) and other frontcountry regions of the Ross Lake NRA.

**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 rockclimbers and mountaineers nation-wide. 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.

## I. INTRODUCTION

The Skagit River Gorge has fast become one the most outstanding rock climbing and bouldering areas in Washington State. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, unique climbing challenges, and convenient access. People familiar with the outstanding quality area and large number of regional climbers expect climbing activity to only increase.

The Access Fund has a proud record of conservation work and climber activism in Washington State,<sup>[1]</sup> and a significant number of our members climb in Washington and the SRG in particular. With climbers representing perhaps the largest growing recreation user groups in the SRG, the Access Fund believes a climbing management plan is needed for this area and we would like to offer assistance towards this planning initiative. Following are examples of how the Access Fund has assisted land management agencies in climbing management and general planning initiatives:

- • Advice on visitation, use patterns, and climbing techniques and tools.
- • Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletter.
- • Helping conduct and/or undertake surveys of climbing activity to determine management preferences.
- • The Access Fund Climbing Preservation Grant program provides funds for research, monitoring, educational outreach and stewardship projects at climbing areas on an annual basis. Specific components of this CMP may be appropriate for Access Fund grant support.

The Access Fund recognizes that recreational access must be balanced with proper management (which may includes restrictions) to protect the natural and cultural resource values and the integrity of the landscape. However, it is important to note that the SRG contains some of the most unique, popular, and challenging technical climbing opportunities in the region and that this areas lies within a national recreation area. The Access Fund is concerned with the

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<sup>[1]</sup> For example, the Access Fund has purchased portable toilets, paid for the construction of information boards; provided input to management plans, and organized projects to build rock retaining walls and climbers' trails at locations such as Frenchman's Coulee, Little Si, Exit 38, the Leavenworth area, Mount Rainier National Park, and Beacon Rock.

preservation of these opportunities, and we provide comments herewith to assess the probable effect of this proposed management initiative.<sup>2[2]</sup>

## **II. GENERAL COMMENTS**

The NPS scoping newsletter for the Ross Lake NRA CMP notes “the determination of whether rock climbing is an appropriate activity must be made on the basis of park-specific planning.” As you know, National Park Service (NPS) policy recognizes that providing for visitor recreational use has been a fundamental purpose of NPS areas since the establishment of Yellowstone National Park in 1872. NPS Management Policies state that “the National Park Service will encourage recreational activities that are consistent with applicable legislation [and] that promote visitor enjoyment of park resources through a direct association or relation to those resources.”

Congress established National Recreation Areas of federal land primarily to serve recreational needs. Among other things, the Ross Lake National Recreation Area was established to preserve “certain majestic mountain scenery . . . for the benefit, use, and inspiration of present and future generations.” The enabling legislation for the Ross Lake NRA specifically identified portions of “the Skagit River and Ross, Diablo, and Gorge Lakes, together with the surrounding lands . . . to be used for public outdoor recreation use and enjoyment.” The National Park Service is charged with administering North Cascades National Park and its adjoining NRAs “in a manner which will best provide for public outdoor recreation benefits.” Indeed, the Statement of Purpose for North Cascades National Park and its neighboring NRAs is “to provide outdoor recreation use and enjoyment for the public, and for the conservation of the scenic, scientific, historic, and other values contributing to public enjoyment.”

While traditional mountaineering has long been a popular recreational activity within North Cascades National Park and its adjacent NRAs, technical rockclimbing and bouldering are uses that may reflect the largest growing recreational use in the Ross Lake NRA and the SRG in particular. Because the very purpose of the Ross Lake NRA is to provide recreational opportunities, and climbing use in the Ross Lake NRA is dramatically on the rise, it is practical and

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<sup>2[2]</sup> These Access Fund scoping comments are purposefully more in-depth than may be typical for the NEPA scoping process. In my experience, some of the most important planning decisions are made following the scoping period when agency planners are formulating specific alternatives based on scoping feedback. Thus, my comments are more comprehensive than simply stating what I believe should be the scope of the Ross Lake NRA CMP.

appropriate that climbing not only be considered an appropriate activity within the Ross Lake NRA, but also that a management plan be developed that enhances climbing opportunities at the SRG. Accordingly, the Access Fund believes that the Ross Lake NRA CMP should be developed and implemented to both protect the natural environment from recreational impacts, while at the same time assist opportunities for climbing and bouldering. The Ross Lake NRA CMP should also acknowledge the significance of the SRG as a unique and outstanding climbing resource and identify management actions to preserve the area's unique climbing experience.

### **III. PRELIMINARY ISSUES IDENTIFIED BY THE NATIONAL PARK SERVICE**

The following Access Fund comments address issues that the NPS has identified as preliminary issues to be covered in the Ross Lake NRA CMP.

#### **A. Fixed Anchors**

The Access Fund has a long history of working on fixed anchor policies with land management agencies. Indeed, we are currently assisting all the major federal land agencies to develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas. Fixed anchors, especially bolts, are sometimes controversial. In our experience concerns about bolting are almost never related to the resource impacts that may be associated with the placement and use of these traditional climbing tools, but rather to philosophical convictions. The NPS must protect the resource, but is required only to consider (not necessarily satisfy) the philosophical priorities of climbers or any other interest group. We maintain that any decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment.

It is the Access Fund's position that fixed anchors are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for fixed anchors to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. Furthermore, the specific character of the rock at the SRG requires that some level of fixed anchor use be authorized if climbing is to take place there at all. Accordingly, the Access Fund believes that some level of fixed anchor use must be allowed wherever

climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations.

Outreach and education for the climbing community will likely mitigate any impact concerns the NPS may have regarding fixed anchors. For example, the relatively small number of “first ascensionists” could be encouraged to use naturally colored or painted fixed anchor materials and related hardware to limit issues concerning visual aesthetics. Please see the “New Route Development” section below for more comments on fixed anchor issues, ways to manage potential resource impacts, and model fixed anchor authorization processes.

### **B. Informal Paths to Climbing Areas**

At present there exists a fairly minimal network of user-built trails established by the climbing community to access the various climbing cliffs and bouldering areas within the SRG corridor. The Ross Lake NRA CMP should consider whether these trails should be formally acknowledged and incorporated into the GMP, and if so determine what level of trail development is appropriate/required, what materials should be used, and what level of maintenance will be regularly needed, if any.

The Access Fund encourages the NPS to inventory this network, establish baseline data, and analyze where trails need maintenance, upgrading, relocation or closure. Following such an analysis, these climber access trails may be formally incorporated into the Ross Lake NRA’s trail plan so that maintenance work can be facilitated commensurate with the NPS’s NEPA obligations, and in so doing streamline any necessary environmental compliance reviews. Once these trails are incorporated into the formal Ross Lake NRA trail plan, time consuming and expensive environmental reviews will not prevent even the most basic maintenance on existing trails.

In maintaining these trails, the NPS should consider working with the Access Fund and the local climbing community to help build effective trails using volunteers for high use climbing and bouldering areas. Climber assistance for constructing access trails has proven successful elsewhere in Washington, including popular locations such as Little Si and Exit 38 near Seattle where volunteers worked with agency officials to build trails and address erosion concerns.

### C. Removal of Vegetation from Climbing Routes

The Access Fund supports natural resource management decisions based on thorough information about the condition of field resources and visitor use. The use of baseline data is critical to making informed decisions when imposing management prescriptions protecting natural resources. The Ross Lake NRA CMP should clarify how such information will be gathered and a timeline identified for an inventory of natural resources and associated recreation impacts or potential impacts.

Any analysis of the effects of recreational use on resource values should begin by looking at patterns and levels of use, as well as the location and sensitivity of the resource values. Only once this information has been obtained can a determination be made as to whether any management intervention is necessary for protection of that resource value. If management intervention is required to mitigate climbing impacts to vegetation we encourage resource managers to work closely with the Access Fund or other established and experienced local climbing advocacy groups on developing and implementing a consistent management protocol to preempt such impacts. Our broad experience of working on resource protection issues nationwide can help develop effective management approaches which do not require an intensive commitment of administrative resources yet ensure effective resource protection.

While resource preservation is an integral component of the NPS mission, the National Park Service must also manage to provide for recreational opportunities. Indeed, recreational climbing is a historic and celebrated use of North Cascades National Park. For every permissible activity on NPS land there is an implied *de minimus* commitment of resources necessary to provide for that activity. Hikers need trails built which alter the landscape; horseback riders need hitching racks; tour groups need large parking lots paved; the general public now expects extensive visitor centers and interpretive exhibits such as the one built in Newhalem. This *de minimus* commitment of resources must be allowed for rockclimbing to continue as a legitimate use of the Ross Lake NRA.

Nonetheless, there exists a limit to the degree of route “cleaning” and “scrubbing” that goes beyond what should be considered appropriate. While the accidental dislodging of rocks must be expected in an activity like rockclimbing, intentional “trundling” must be discouraged. The NPS can address this issue by educating the climbing public as to safety and ecological concerns through on-site signage and community outreach. Further, the wholesale removal of organic material

from cracks or the rock face should likewise be discouraged. The NPS should analyze and document exactly what degree of cleaning, and/or scrubbing will result in long-term negative effects on the SRG. Certainly a *de minimus* degree of these activities must be allowed for rockclimbing to continue and will not result in impairment of the resource.

It is important to note that, unlike other climbing areas across the country, the practice of route cleaning is required anywhere a new route is established in wet, lush environments such as western Washington. This practice is not unlike the necessary removal of substantial organic material for trail building or the construction of any other “infrastructure” needed for authorized human activity. The NPS may want to consider a test area to identify the real impacts caused by such cleaning. A quick walk through the woods in the SRG reveals no lack of organic material everywhere one looks: moss, lichen, ferns, grass, trees, and the like. The Access Fund does not advocate for the wholesale removal of organic material to provide climbing and bouldering opportunities, but the NPS should look at the relative impacts caused by these activities in terms of both what impacts other accepted activities cause and the fact that all of this flora obviously grows back quickly and in plentiful amounts.

#### **D. Human Waste**

Human waste can be a significant issue at areas that are popular climbing locations. The Ross Lake NRA CMP should provide alternatives that consider whether toilet facilities are required near high use climbing areas. Additionally, educational signage educating climbers regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices.

Human waste is an issue anywhere it’s a problem for both aesthetic and environmental reasons. The Access Fund has found that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and suggest alternative conduct that can ameliorate the problem. The NPS should document the extent of this impact prior to or during the implementation of the CMP, so that any proposed management solutions will be based on objective information rather than assumption that human waste has become a “problem.”

#### **E. Cultural Resources**

The Access Fund supports cultural resource management decisions based on thorough information about the condition of field resources and visitor use. Again, the use of baseline data is critical to making informed decisions when imposing management prescriptions to protect cultural resources. The Ross Lake NRA CMP should clarify how such information will be gathered and a timeline developed for an inventory of cultural resources and associated recreation impacts or potential impacts. As with natural resources, any analysis of the effects of recreational use on cultural resource values begins by looking at patterns and levels of use, as well as the location and sensitivity of these resource values. Once this information has been obtained a determination may be made as to whether any management intervention is necessary for protection of that resource value.<sup>3[3]</sup>

## **F. Safety**

Safety issues related to climbing in the SRG mostly concern parking availability and hiking access along Highway 20. Issues concerning appropriate transportation related facilities (parking, pullouts, etc.) are relevant and necessary for consideration in this CMP. The Ross Lake NRA CMP should analyze alternatives for popular parking locations (especially near the most popular cliffs and bouldering areas), and identify ways that parking may be provided that are safe, environmentally sound, convenient, and effective (i.e., climbers will use them). Education and outreach is critical here: signage informing climbers as to the best parking areas and access routes will limit safety hazards caused by climbers hiking along Highway 20. Likewise, signage along the road informing

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<sup>3[3]</sup> Just as with the issues related to protecting flora and fauna, there exist laws and regulations that protect recognized historical and cultural resources. This management authority already provides the NPS with the legal means to implement protective measures that may affect recreational use patterns at the SRG which may or have already adversely affected such historical and/or cultural resources. As such, it may be unnecessary to specifically address such issues in the Ross Lake NRA CMP other than to implement some pro-active mitigation measures to, for example, preserve rock art adjacent to popular climbing routes or bouldering areas. However, unless there are specific cultural resource conflicts with recreation and agriculture that are currently identifiable, the Access Fund suggests that the NPS use existing federal and state laws—instead of this CMP—to manage for the protection of historic and cultural resources. Presumably, the NPS currently has data identifying the locations of cultural resources throughout the Ross Lake NRA, and no doubt much of this information is sensitive and confidential. Nevertheless, the interface between the location of such cultural resources and recreational activity should be appropriately analyzed in detail before any management prescriptions are identified and imposed under this CMP. Please consult the Access Fund’s document “Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan” for examples where land managers have provided cultural resource protection while also providing continued climbing opportunities.

drivers as to the presence of pedestrians – with associated reduced speed limits – will reduce safety hazards as well.

### **G. Development of New Climbing Routes**

Issues related to the development of new climbing routes is perhaps the most important component of this CMP because such development – and the way the NPS manages such development – will affect most if not all other issues in this CMP. Accordingly, the bulk of my comments address this important issue.

Because the CMP concerns a national recreation area, it is important that the NPS institute a presumption that new climbs and bouldering areas be authorized within the SRG in those areas where new routes are deemed appropriate, rather than the converse where the onus is on the new-routes ascensionist to establish or argue for permission in those areas where there is no finding of adverse impact on sensitive, threatened or endangered plant or animal communities present within the climbing zone. Unless there is a clear, imminent need to prohibit new routes based on objective environmental or social data, the presumption should remain that new climbing/bouldering routes are authorized.

The NPS at Ross Lake NRA may want to review established CMPs established by other NPS units. Two exemplary CMPs that address many of the same issues that concern the NPS at Ross Lake NRA are:

- • The New River Gorge National River  
<http://www.nps.gov/neri/cmp/>
- • The Obed Wild and Scenic River  
<http://www.nps.gov/obed/final-CMP.pdf>

As in the above noted NPS CMPs, the NPS at Ross Lake NRA should develop criteria that would guide and direct decisions on managing new climbing/bouldering routes. A first consideration for management action by the NPS should determine whether potential impacts to resources can be mitigated through climber education. In cases where documented sensitive resources are present, new routes could be allowed by permit. The Access Fund believes the NPS should focus on responding with a reasonable lesser restrictive alternative to address resource impacts rather than the all-too-often approach of simply closing areas down. The NPS should also consider effective means by which it can notify

the climbing public of any interim or permanent closures such as signage or media outlets.

If any restrictions are considered, the NPS should develop a criterion/question that asks: “are climbing activities likely to have an adverse impact on cultural resources or special status plant or animal communities present within the management area?” In developing this kind of analysis, the NPS should define precisely what “adverse impact” means within this context. Without such a clear definition it is difficult to proceed without resultant arbitrary determinations and management actions. By clearly setting such impairment standards that equate to an “adverse impact” the NPS will prevent any future arbitrary evaluations that climbing impacts constitute “adverse impacts” thus preventing the establishment of any new climbing routes or bouldering areas within the SRG.

Another method of preventing unwanted impact is to determine how much change to the environment is acceptable. The Access Fund suggests that the NPS use the “limits of acceptable change” (LAC) analysis to determine whether any activity within the Ross Lake NRA needs management intervention.

#### 1. Limits of Acceptable Change (LAC)

As NPS recreation planners at Ross Lake NRA are aware, the LAC process is used by land managers across the country as a means of coping with increasing demands on recreational areas such as the SRG in a visible logical fashion. The challenge is not one of how to prevent any human-induced change to the SRG, but rather one of deciding how much change will be allowed to occur, where, and the actions needed to control it. The process requires deciding what kinds of conditions are acceptable, then prescribing actions to protect or achieve those conditions. If an area does not meet those acceptable conditions, then management actions must be taken to correct the situation. For example, if an area receives very heavy route cleaning or trail impacts that cause unacceptable damage to the resource, then management actions may be implemented to mitigate further impacts or rehabilitate the area. As you know, the general LAC process consists of nine steps that can be broken down into four major components:

- • LAC Component I - Identify Issues, Concerns And Opportunities

Step - Identify area issues and concerns.

Step 2 - Define and describe opportunity classes.

- • LAC Component II - Determine Present Condition Of The Skagit River Gorge  
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Step 3 - Select indicators of resource and social conditions.

Step 4 - Inventory existing resource and social conditions.

Step 5 - Specify measurable standards for the resource and social indicators selected for each opportunity class.

- • LAC Component III - Determine Action Plan

Step 6 - Compile information from Components I & II and identify alternative Opportunity class allocations.

Step 7 - Identify what management actions would be needed for each alternative From Step 6.

Step 8 - Evaluate and select a preferred alternative. This determines an action plan.

- • LAC Component IV - Implement And Monitor Action Plan

Step 9 - Implement actions for preferred alternative and monitor conditions

## 2. Visitor Experience and Resource Protection (VERP)

In addition to management prescriptions to protect natural and cultural resource concerns, the quality of the visitor/climber experience should be considered when addressing the management of new route development. The Access Fund recommends that the NPS also evaluate existing and possible future climbing routes through the Visitor Experience and Resource Protection (VERP) guidelines to determine how best to preserve climbing opportunities, protect the resource, and provide for new routes opportunities where consistent with other management priorities and climber preferences. A central component of the VERP program is to identify indicators and standards of the quality of the visitor experience. Indicators are measurable variables that define the quality of the visitor experience, while standards specify the desirable or acceptable condition of indicator variables.

The VERP framework includes nine elements:

- (1) Assemble an interdisciplinary project team;

- (2) (2) Develop a public involvement strategy;
- (3) (3) Develop statements of park purpose; identify planning constraints;
- (4) (4) Analyze park resources and existing use;
- (5) (5) Describe a potential range of visitor experiences and resource conditions;
- (6) (6) Allocate potential zones;
- (7) (7) Select indicators and standards for each zone; develop a monitoring plan;
- (8) (8) Monitor indicators; and
- (9) (9) Take management action.

For more information see “The Visitor Experience and Resource Protection (VERP) framework: a handbook for planners and managers.” U.S. Department of the Interior, National Park Service. 1997. VERP may be used by the NPS over the long-term as a tool to provide a quality climbing and bouldering experience within the Ross Lake NRA.

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### 3. New Route Authorizations

If necessary, the NPS may want to consider established processes for new route authorizations, some of which use advisory councils made up of local climbers. This type of system is well established at climbing areas across the country. For examples of similar fixed anchor application review procedures, and climbing advisory councils, consult the following:

Red River Gorge, Daniel Boone National Forest, KY:

<http://www.rrgcc.org/index.php?category=Climbing+Advisory+Council>

<http://www.rrgcc.org/index.php?category=New+Route+Application+Process>

Eldorado Canyon State Park, CO:

<http://parks.state.co.us/eldorado/stewardship.asp>

Joshua Tree National Park, CA:

<http://www.friendsofjosh.org/about/>

<http://www.friendsofjosh.org/news/news/climbingCommittee.asp>

Iowa State Lands, IA

<http://www.state.ia.us/government/dnr/commissions/nrc/summaries/junenrcminutes.htm#Final%20Rule—Chapter%2051,%20Game%20Management%20Areas>

<http://www.geocities.com/eiowacc/main.htm>

#### **IV. IDENTIFICATION OF ADDITIONAL ISSUES**

The following are additional issues that the Access Fund believes should also be addressed in the Ross Lake NRA CMP.

##### **A. Education/Community Outreach**

A climber education program is a critical component to any effective climbing management plan. Nearly all climbers will choose to “do the right thing” if they know the appropriate behavior. For example, signage educating climbers regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund applauds the proactive management approach taken by the NPS at the Ross Lake NRA, but for this CMP to be successful the NPS must do more than simply enforcing regulations or filing reports. Rather, the NPS should work with the climbing community to foster understanding, appreciation, respect, and a sense of ownership for the natural and cultural resources of the Skagit River Gorge.

In addition to promoting a Leave No Trace ethic at the SRG, the NPS should continue to do all it can to incorporate the climbing community into any management initiatives – such as closures – that may affect public use of the area. By soliciting input from the climbing community on any proposed management initiative, the NPS will secure a key partner that can provide insight into specific resource issues and conditions, labor for building trails or other infrastructure, support for compliance, and a good relationship with one of its largest user groups. Climbers have a long tradition of resource stewardship and support for natural and cultural resource protection. This tradition can be harnessed to support NPS planning, through consistent outreach and an emphasis on education rather than law enforcement.

We recommend that all issues pertaining to climbing in the SRG, including climbing use patterns, climber traditions and history, or information about technical climbing tools and ethics, be dealt with through a climbing advisory/working group. Such a group will facilitate gathering, sharing and processing information on specific issues. This approach may also be desirable for the consideration of educational outreach and human waste issues. The following interested parties may be helpful regarding any climbing management planning for the Ross Lake NRA:

Jason Keith  
The Access Fund  
[jason@accessfund.org](mailto:jason@accessfund.org)

Andy Fitz  
[fitlan@attbi.com](mailto:fitlan@attbi.com)

Andrew Sell  
[sell.a@portseattle.org](mailto:sell.a@portseattle.org)

David Speyrer  
[david@valvesoftware.com](mailto:david@valvesoftware.com)

Staff - Cascade Craggs  
[staff@casadecrags.com](mailto:staff@casadecrags.com)

## **B. Sunset Date**

The Ross Lake NRA CMP should indicate the duration of the proposed management initiative. Typically such plans have reauthorization dates of five years following plan approval to allow for any necessary revisions. Accordingly, the NPS should provide a time-period specifying the effective duration for this proposed Ross Lake NRA CMP.

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I hope the above information helps the NPS identify the appropriate scope for the Ross Lake NRA CMP, and clarifies ways in which the Access Fund can be of assistance. Please do not hesitate to contact me if you require more information, or would like to discuss any of the points covered in this comment letter.

The Access Fund looks forward to working with the NPS and any interested parties throughout the planning process for the Ross Lake NRA CMP. The quality and increasing popularity of this sensitive area underscores the need for a comprehensive plan to manage climbing and bouldering. At the same time, the opportunity for local stewardship projects by the climbing public is encouraging and provides a timely opportunity to gain public investment in management policy for this special area.

The Skagit River Gorge is truly a regional treasure, both as a climbing and bouldering resource, as well and as a unique natural area. On behalf of the American climbing community, the Access Fund thanks the National Park Service for soliciting public input, and for its commitment to preserving the exceptional climbing opportunities found at the SRG. We hope our comments will provide a meaningful contribution to both the substance and clarity of the CMP regarding planning goals, objectives, and strategies.

Finally, I would like to again thank you for accompanying me – along with several of your staff members – to the crags and bouldering areas in the SRG last summer. I have worked with numerous land agency officials across the country on climbing management planning and the simple fact that you considered this issue important enough to schedule a field trip with several of your employees speaks to the commitment you have to your job and care you have for your jurisdiction. The climbing community is lucky to have dedicated officials such as yourself in charge of managing such an extraordinary place.

Best Regards,

Jason Keith  
Policy Director  
The Access Fund

Cc: Steve Matous - Executive Director, The Access Fund  
Access Fund Policy Committee  
Andy Fitz -Washington climber

Andrew Sell - Washington climber  
David Spreyer - Washington climber  
Cascade Crags - Everett, WA climbing store