VIA EMAIL

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March 26, 2002

Re: The Access Fund Comments on Environmental Assessment and Draft Climbing Plan for Obed Wild and Scenic River

Dear Unit Manager Stoehr:

The Access Fund welcomes the opportunity to comment on the Environmental Assessment and Draft Climbing Management Plan (Draft CMP) for Obed Wild and Scenic River (OWSR). We look forward to working with the Park Service to preserve climbing opportunities and conserve the climbing environment at the Obed Wild and Scenic River.

The Access Fund

The Access Fund is a 501(c) 3 non-profit conservation and advocacy organization representing the interests of American rock and mountain climbers. The Access Fund is the largest national climbers 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.

A significant number of the Access Fund's members climb in the OWSR. The Access Fund has a proud record of conservation activism at the OWSR, most prominently was an Adopt-A-Crag event that received the Access Fund's annual award for the year 2000. Although there were 65 events held nationally and the Obed effort received the top award for 2000.

As you are probably aware, the OWSR contains some of the most unique, popular, and challenging technical climbing opportunities in the Southeast. The Access Fund is concerned with the preservation of these opportunities, and we have reviewed the Draft CMP to assess the new

management direction's probable effect on climbing and the climbing environment. The Access Fund offers herewith some other observations and suggested improvements to the Draft Climbing Management Plan.

GENERAL REMARKS

The Access Fund applauds the NPS for its ongoing effort to solicit public feedback to the Draft Climbing Plan for OWSR. We look forward to working closely with the NPS on this endeavor. The Obed River is a unique and popular climbing area. The area has relatively undisturbed natural environment, scenic qualities, excellent rock and variety of climbing opportunities have made the Obed into one of the finest climbing areas in the Southeast. The singular climbing experience found at the Obed is part of the fundamental character of the river corridor, and management planning should provide for the preservation of this experience to the greatest extent possible consistent with resource protection objectives.

The Access Fund supports the selection of Alternative C, with conditions, as the best approach for managing climbing at the OWSR. We believe Alternative C – sportclimbing authority throughout the entire OWSR – is a more reasonable management direction that may be changed in the future to address site-specific resource concerns. Alternative C would allow for the most recreational opportunities, while at the same time providing for significant environmental protection. Alternative C could implement the same review process articulated for new routes under Alternative A, thus ensuring the ecological and social integrity of the OWSR. The Draft CMP fails to indicate why this plan does not best serve the needs of the recreational community while at the same time addressing the specific mandates required of the Park Service, such as preserving threatened or endangered species, maintaining any cultural resources, and respecting the social concerns of other visitors at the OWSR. It appears that Alternative C clearly serves all of these needs, thus the OWSR should specify why Alternative C should not be the selected alternative.

Nonetheless, The Access Fund also believes that Alternative A, with conditions, could also maintain ecological, cultural, and social concerns while at the same time provide for significant recreational opportunities. While Alternative A limits the scope of new sport-route development in areas that may pose no threat to the environment by the establishment of new sportclimbing routes, The Access Fund would support Alternative A with conditions that would ensure consistency throughout the CMP, and provide for timely new route application processes. The comments submitted herewith address issues on point-by-point basis as noted in your section outlining Alternative A – Preferred, and suggest alteration that both enhance climbing opportunities while at the same time provide for ecological protection at the OWSR.

ALTERNATIVE A (Preferred)

Research to Support the Plan

The Access Fund agrees that a baseline study to inventory and map existing climbing and bouldering routes is crucial to manage climbing and protect natural and cultural resources at the OWSR. We note your intention to approach The Access Fund as a funding source for these research initiatives. The Access Fund's Conservation Grants Program has provided hundreds of

thousands of dollars over the past twelve years for environmental restoration, trail building and maintenance, support for wildlife programs, climber education, and facilities such as parking area improvements, waste disposal units, and trailhead signage. The Access Fund Grants Program funds projects that preserve or enhance climbing opportunities and conserve the climbing environment throughout the United States. Please consult our website to review project funding criteria, and the process for applying for grants which we award three times annually. We encourage the NPS to look to The Access Fund as a resource to help with developing, implementing and funding climbing management actions at the OWSR.

Rock Climbing Use Levels

Any analysis of the number and status of climbing routes at the OWSR should proceed from an objective basis, that is, a description on the present condition of routes, an assessment of climber preferences and expectations, an assessment of the relationship between climbing activities and recorded resource impacts, and the articulation of desired future conditions. To begin this process it is imperative that the OWSR completes baseline studies to inventory and map existing climbing and bouldering routes. The OWSR should consider soliciting input from the local climbing community to determine user preferences regarding use levels. A survey seeking to objectively ascertain use levels is crucial to assess capacity limits (see Carrying Capacity for the Climbing Zone below).

Moratorium on New Fixed Anchors

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 bolting 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 bolts are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for bolts to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. The Access Fund encourages the OWSR to consider a shortening of the moratorium period from the stated 3-5 year period. It may be that the research conducted to implement the CMP will take less than this period for selected areas, such as the proposed Climbing Zones, and thus it is a more reasonable approach to open areas for new fixed anchor placement as the studies for those areas are completed and the NPS makes a determination about the efficacy and appropriateness of new routes and new fixed anchors. The OWSR should lift new fixed anchor moratoriums as these studies are completed and evaluations determine the appropriateness of new fixed anchors.

Climbing Zones

As noted above, The Access Fund urges the OWSR to consider Alternative C, which would provide for sportclimbing outside of the Climbing Zones defined in section 2.1.3 and Figure 2 of

the Draft CMP. Bolted sportclimbing may be appropriate at selected sites outside of these Climbing Zones; the same criteria evaluating the impact of climbing on ecological resources within the Climbing Zones may be employed outside these Climbing Zones. Furthermore, the permit process can serve as a tool to further limit the proliferation of bolt-intensive sportclimbs outside of the defined "Climbing Zones."

The Access Fund disagrees with the statement that "sportclimbing is less of a nature- and park-dependent activity than traditional or other types of climbing." Many, if not most, sportclimbers consider that natural environment as a crucial component of their overall experience, and would thus consider their activity to be very much nature and park-dependent. There is no reason to believe that just because many sportclimbs emphasize physical ability and technical difficulty in a safe environment utilizing fixed anchors that sportclimbers do not very much appreciate the natural environment. If this were true, sportclimbers would only practice their activity at indoor climbing gyms. In fact the opposite is true: sportclimbers target exceptionally scenic areas such as the OWSR precisely for their outstanding natural environments in conjunction with unique climbing opportunities. Accordingly, The Access Fund suggests that the OWSR strike the above statement from the final CMP.

Replacement of Existing Fixed Anchors

The Draft CMP notes that "[c]limbers would be responsible for replacing existing bolts and other fixed anchors after consultation with the NPS." It is not clear how this "consultation" process would work. We assume that this "consultation" process is not the same as the prescribed "New Routes by Permit" process. The OWSR should clarify the exact process and governing standards that might control the NPS consultation process required of climbers before they can replace existing fixed anchors.

New Sport Climbing Routes

The Access Fund notes a number of issues related to the "New Sport Climbing Routes" authorization process outlined in the Draft CMP. These are as follows:

1. OWSR identifies criteria that would guide and direct decisions on whether to allow new sport climbing routes. The second criteria/question asks: "are climbing activities likely to have an adverse impact on these communities [sensitive, threatened, or endangered plant or animal communities present within the climbing zone]?" Draft CMP, at 9.

   OWSR should define precisely what "adverse impact" means within this context. Without such a clear definition it is difficult to proceed through the rest of the guiding criteria. The Access Fund suggests that the OWSR use the "Impact Measurement" spectrum outlined at section 4.1.1 under the 4.0 Environmental Consequences section of the Draft CMP (see page 23, OWSR Draft CMP) to determine whether any activity within the OWSR has an "adverse impact" in need of mitigation. We suggest that the effect Intensity should rise to the level of Major if of a Short Term duration for mitigation management to be triggered. Likewise, a Moderate Intensity of effect that has a Long Term duration could also trigger mitigation management if the best professional judgment of the NPS determines such effect

is likely to rise to a Major effect Intensity. By clearly setting such impairment standards that equate to an "adverse impact" the OWSR will prevent any future arbitrary evaluations that climbing impacts constitute "adverse impacts" thus preventing the establishment of any new sport routes within any given Climbing Zone.

2. The flowchart presented in the Draft CMP states that

> If the answer to both questions is yes, the NPS and the working group would determine if the impacted resources can be avoided through climber education or temporary or permanent closures of selected climbing routes. If permanent closure were the selected option, appropriate restoration efforts would be conducted. In addition, new routes could be allowed by permit within the climbing zone in areas where the species of concern do not exist or are not being impacted.

Draft CMP, at 9. The Access Fund applauds the OWSR's focus on responding with a reasonable lesser restrictive alternative to address resource impacts rather than the all-too-often approach of simply closing everything down. OWSR should, however, consider effective means by which it can notify the climbing public of any interim or permanent closures.

3. The OWSR flowchart also states

> If the answer to the first question is yes and the second question is unclear or indeterminate, the NPS would conduct further research to determine if climbing activities are having a detrimental effect on the species of concern. The moratorium on new fixed anchors would remain in effect until a determination is made.

Draft CMP, at 9. Here again, the OWSR should establish a clear standard as to what constitutes a "detrimental effect" such as would maintain the fixed anchor moratorium. The Access Fund again suggests that the OWSR use the Impact Measurement Intensity spectrum outlined on page 23 of the Draft CMP. Importantly, the NPS should set out guidelines for a timeline by which it would "conduct further research" under this section so that this "process" does not constitute a *de facto* permanent moratorium because such "further research" is never conducted.

4. It is important that the OWSR institute a presumption that new sportclimbs be authorized_that is the moratorium be lifted_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 the lifting of the new fixed anchor moratorium 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 sportclimbing routes are authorized.

5. The Draft CMP states:

> Bolts, fixed anchors, and new sport routes would be allowed by NPS permit. Climbers would notify the NPS of desired locations for new routes. The NPS would conduct necessary environmental compliance reviews and prepare a permit(s) for the new route(s) if appropriate. The decision to grant or not to grant a permit for a new sport route would be based on whether sensitive natural or cultural features exist in the area, the quality of the climbing experience, and the density of the routes in the area.

Draft CMP, at 9. The Access Fund notes several potential problems with this section.

a. It is not clear whether "necessary environmental compliance reviews" means complying with the OWSR's NEPA obligations. NEPA process issues should not become *de facto* bans on fixed anchors. Therefore, the OWSR's NEPA processes should be structured to prevent such a *de facto* prohibitions. If the OWSR requires an Environmental Assessment and FONSI for each permit application, the OWSR will greatly increase its workload and it will take unreasonably long to process such applications resulting in a *de facto* moratorium on new fixed anchors because such applications will never get processed or approved. A solution to this problem is to conduct "umbrella" environmental assessments for each climbing zones, analyzing impacts for a projected number of fixed anchors in that specific climbing zone. Site or route-specific EAs could be conducted for fixed anchor applications outside of the Climbing Zones on a case-by-case basis.

b. Secondly, because "the quality of the climbing experience" is a criterion for approving new route applications, The Access Fund suggests that OWSR establish a fixed anchor advisory committee (FAAC) comprised of experienced climbers familiar with both establishing new bolt-intensive routes, and the specific conditions there at the Obed. Such a FAAC serves at least two purposes:

    i. The FAAC would review and initial approval of all route applications, evaluating whether such new route would enhance the climbing experience at the Obed, and whether the proposed new route would unreasonably increase the density of routes in that particular area. After this first level of approval, the FAAC would make a recommendation to the recreation managers at OWSR as to whether the application should be approved, approved with conditions, or rejected. This FAAC evaluation analyzes the subjective aesthetic aspects of the proposal by a group of experienced climbers familiar with that particular area.

    If the application is recommended for approval by the FAAC, then the OWSR would evaluate the application for whether the proposed

new route would "adversely impact" any sensitive natural or cultural features in the area. This OWSR evaluation analyzes the objective environmental impacts of the proposal by appropriately trained OWSR scientists. Likewise, OWSR officials could also approve or reject any application based on subjective aesthetic criteria that are acknowledged by the FAAC.

ii. By allowing the FAAC to assume much of the administrative analysis related to new fixed-anchor applications, the OWSR is relived of a substantial amount of the workload related to such applications, yet the OWSR retains crucial oversight and "veto power" over any applications approved by the FAAC.

Clearly, the OWSR has the discretion to accept or reject any recommendation by the FAAC, but this system appropriately allows for climbers to evaluate proposal aspects that closely affect the "quality of the climbing experience," while the OWSR retains hands-on control over any proposals that would affect the environment. 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

Carrying Capacity for the Climbing Zone

The Access Fund does not know how many climbing routes are presently established at the Obed, or what the potential at the OWSR is for additional routes, but we support a carrying capacity based approach to management of the recreational experience. We suggest the raw number of established or potential climbing routes is less significant than the environmental effects associated with these routes.

We recommend the NPS 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) develop a public involvement strategy; (3) develop statements of park purpose; identify planning constraints; (4) analyze park resources an existing use; (5) describe a potential range of visitor experiences and resource conditions; (6) allocate potential zones; (7) select indicators and standards or each zone; develop a monitoring plan; (8) monitor indicators; and (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.

Traditional Climbing

As stated above in our comments concerning the Draft CMP section entitled "Climbing Zones," The Access Fund disagrees with the statement that "In traditional climbing, the focus is more on nature and the outdoor world than with sport climbing . . . ." This generalization is erroneous and inappropriate to use as a presumption to justify any management initiatives. Again, many, if not most, sportclimbers consider that natural environment as a crucial component of their overall experience, and would thus consider their activity to be very much focused on nature and the outdoor world. Sportclimbers travel to scenic areas such as the OWSR precisely for their outstanding natural environments in conjunction with the unique climbing opportunities. Therefore, sportclimbing, just as in traditional climbing, hiking and paddling, is a "park-dependent activity" at OWSR. Accordingly, The Access Fund suggests that the OWSR strike the above statement from the final CMP.

In section 2.1.4, the Draft CMP states that while "traditional climbing would be allowed throughout the entire Obed WSR," traditional routes "that require fixed anchors would be subject to the same conditions that apply to sport routes. These conditions are discussed in Section 2.1.3 Climbing Zone." Thus, it seems that any traditional route that had even one fixed anchor would be prohibited outside the established sportclimbing "Climbing Zones." This rule is problematic because while it might halt the proliferation of bolting outside the established climbing zones, it would promote the degradation of cliff-top ecologies above traditional routes because every time a climber climbed a

traditional route he or she would be forced to "top-out" thus impacting the terrain at the top of the cliff.[1]

The Access Fund suggests that the OWSR revise its policy to allow for permitted fixed anchors outside the Climbing Zones at the top of traditional routes so that climbers are not required to "top-out." That is, each traditional route could qualify, through the usual permit process, for two fixed anchors at the top of the route_just below the cliffline_whereby the climber could rappel down and not be required to top-out. By instituting such a policy, the OWSR's Draft CMP would be consistent in its allowance of traditional climbs outside the established sportclimbing climbing zones, while adhering to its policy that routes should not top-out so to protect the cliffline ecosystem.

Rappelling

The Access Fund supports the restriction of organized rappelling to the two designated areas depicted in Figure 2 to limit impacts to sensitive vegetation and easily eroded soils on cliff-tops. To be consistent with the goal of protecting damage to cliff-top vegetation, the OWSR should consider establishing fixed anchors at these designated rappelling areas to protect trees used for rappel anchors.

The Draft CMP, under Alternative A, states that "Rappelling would be restricted to two designated areas that are depicted on Figure 2." Most (but not all) new routes ascensionists place fixed anchors by rappelling down the cliff face and drilling holes at predetermined locations that make sense in terms of maximizing the protection of the climber, and facilitating ease of use. If these new-route ascensionists were prohibiting from rappelling when they place new fixed anchors, the number of new routes would be greatly reduced because most climbers do not place fixed anchors from "the ground-up." Accordingly, the CMP should state that organized rappelling groups are restricted to the two designated areas depicted in Figure 2, whereas new-route ascensionists may rappel to place fixed anchors on approved permitted new routes.

Other Areas and Activities

As noted above, the OWSR should consider its policy that areas "outside the climbing zone (see Figure 2) would remain free of bolts and other fixed anchors" so to protect cliff-top ecologies above traditional routes. Permitting two fixed anchors at the top of each traditional route would go a long way towards protection cliff-top ecologies over the long-term.

Prohibited Activities

For apparent environmental and aesthetic reasons, The Access Fund supports the prohibition of the following:

- Climbing or bouldering on, under or within 100 feet of a known archaeological resource
- "Chipping" or gluing

[1] See also the OWSR's draft policy that the NPS "encourages climbers to continue [the] environmentally sensitive practice" that climbs at the Obed WSR not "top-out. " Indeed, the Draft CMP even states that should "routes in the future top-out, the NPS may prohibit the practice to protect the cliffline ecosystem. Draft CMP, at 11.

- "Gardening"
- Using trees for climbing, and
- Leaving fixed ropes for extended periods for the purpose of ascending and ascending (rappelling) rock walls.

However, the Draft CMP should specify why climbing or bouldering on, under or within 100 feet of a bridge, named feature, or designated, developed overlook should be prohibited. Presumably, the OWSR believes that the experience of non-climbers at the OWSR would be negatively impacted_or the environment would somehow be adversely impacted_ by these activities. However, the reasons for all prohibitions should be justified.

Climbing Hardware and Chalk

The Access Fund applauds your intentions to "work with climbers and climbing groups to coordinate chalk clean-ups for high visibility climbing walls and bouldering areas." We also encourage the moderate use of chalk, especially in areas frequented by non-climbers. Future Access Fund Adopt-A-Crag efforts could support future chalk clean-up efforts at the OWSR.

Lilly Boulders

Because there is private land in the vicinity of the Lilly Boulders, and you encourage climbers "to respect private land, private property rights and NPS boundaries" the OWSR should post maps at parking areas and trailheads clearly showing the respective property boundaries with a brief educational message regarding regional private lands.

Route "Top-Outs"

The Access Fund supports the policy of the OWSR to avoid "top-outs" where necessary to protect the rim ecosystem. As noted above, the OWSR should reconsider its policy prohibiting fixed anchors at the top of traditional routes that are located outside the Climbing Zones to protect those cliff-top ecologies.

Trails Parking and Access

As stated, the OWSR should consider educational signage posted to inform climbers as to parking and access to the popular climbing and bouldering areas located at the Lilly Boulders, Lilly Bluff, Obed River and Y-12 Wall, and North and South Clear Creek. Furthermore, the OWSR should begin to develop a contingency plan for parking at Clear Creek if the current private property owner elects to eliminate public parking here. The OWSR should consider obtaining an easement from the landowner for such a purpose.

Climber Education Program

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.

Litter

As noted, future Access Fund Adopt-A-Crag efforts could address any litter concerns caused by recreation users at the OWSR.

Human Waste Disposal

Educational signage educating climbers regarding Leave No Trace principles (www.lnt.org) should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices.

ENVIRONMENTAL CONSEQUENCES

The Access Fund is working with resource managers around the country, on a variety of public lands, to help protect natural resources in areas visited by climbers. We would be pleased to work more closely with the Park Service to identify and mitigate the environmental impacts associated with climbing at the OWSR.

We note that at this time there is no evidence of any nesting raptors within the "existing climbing area." Furthermore, the OWSR has not found any federally threatened or endangered species found within the "current climbing zone." See Draft CMP, at 19. The OWSR should specify what exactly it considers the "existing" and "current" climbing areas and zones_are these areas the *proposed* Climbing Zones depicted in Figure 2, or the entire area within the OWSR where climbing currently now occurs including the areas outside the proposed Climbing Zones? Presumably OWSR means the former. Because the OWSR indicates that "climbing activities are not known to have impacted any of these species" there must, then, be federally threatened or endangered species found *outside* the "current climbing zone." Accordingly, OWSR should indicate any surveys and/or data identifying the location of such federally threatened or endangered species. Finally, The Access Fund also notes that no "cultural resources within the vicinity of the climbing areas have been found. Draft CMP, at 20. Again, the OWSR should specify whether this statement encompasses the entire OWSR where climbing currently occurs, or whether this statement reflects only the proposed Climbing Zones under Alternative A.

It is The Access Fund's experience that virtually all potential threats or actual impacts to natural and heritage 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 such as seasonal restrictions or (in extreme cases) spatially limited closures. We are familiar with a wide range of resource concerns and appropriate mitigation responses, including erosion, loss of vegetation at staging areas, possible effects on nesting birds and rare species, effects on cliff-top (rim) ecologies, possible conflicts with cultural values, and human waste disposal.

One particular form of assistance The Access Fund is pleased to provide is cooperation with wildlife management programs, in particular protection of federally or state listed species of raptors, bats, and flora which may inhabit the cliffs of interest to climbers. We are working with

resource managers at more than fifty areas around the country to educate climbers about peregrine falcon nesting and seasonal restrictions, which are sometimes imposed to promote peregrine nesting. Please see our Web site (www.accessfund.org) for a list of all areas currently subject to seasonal restrictions to facilitate raptor nesting. In addition, we have published a handbook for management of climbing in raptor nesting habitat, which is available by contacting Jason Keith at jason@accessfund.org or (303) 545-6772 x102.

Impact to Soils/Impact to Vegetation/Impacts to Threatened, Endangered, and Sensitive Species

The Access Fund has worked extensively with resource managers around the country to address these specific concerns and would be pleased to work more closely with OWSR on wildlife management in the climbing environment. We have helped to develop successful protocols in other public lands to protect nesting raptors and are helping resource managers in many areas to monitor wildlife activity.

The Draft CMP, at page 24, states that no "resources or values that are key to the natural or cultural integrity of Obed WSR have been adversely affected by climbing at Obed WSR, nor would they be under any of the alternatives described in this plan. Therefore, no impairment of park resources would occur as a result of the implementation of any of the plan alternatives." To ensure that this statement remains true, the OWSR should consider our suggestion to permit fixed anchors at the top of traditional routes located outside the proposed Climbing Zone so to protect cliff-top ecologies.

OTHER ISSUES

Camping

We note that the draft CMP makes no mention of camping facilities at the OWSR. The Access Fund suggests that camping, which is part of the climbing experience at many areas, be evaluated and provided for in the CMP for the Obed. Climbers generally prefer low-cost, primitive camping opportunities and the NPS should determine the need for such opportunities and how (or whether) this need will be met.

Sunset Date

Finally, The Access Fund notes that the Draft CMP fails to indicate the duration of the proposed CMP. Typically such plans have sunset dates of five years to allow for any necessary revisions. Accordingly, the OWSR should provide a time-period specifying the effective duration for this proposed CMP.

As stated, The Access Fund supports the selection of Alternative C as the preferred management approach because it allows for the most recreational opportunities whole at the same time resources at the OWSR. However, we also feel that Alternative A is an acceptable alternative for managing climbing at the OWSR if the conditions suggested herein are considered.

The Obed Wild and Scenic River is truly a national treasure, both as a climbing and boating 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 Obed. The Access Fund commends OWSR for developing a reasonably balanced management direction, which has been inclusive of public preferences and values. We hope our comments will contribute to more objectivity in decision-making and more clarity in the Final Climbing Plan regarding planning goals, objectives, and strategies.

Sincerely,

Jason Keith
Policy Analyst