



June 30, 2021

North Cascades National Park
Attn: Rob Burrows
810 State Route 20
Sedro-Woolley, WA 98284

Submitted online at: <https://parkplanning.nps.gov/commentForm.cfm?documentID=112489>

RE: Washington Climbers Coalition, Access Fund, Leavenworth Mountain Association and The Mountaineers Comments on North Cascades NPS Spacewall Climbing Management Area Environmental Assessment Scoping document

North Cascades National Park Management Staff,

Washington Climbers Coalition, Leavenworth Mountain Association, The Mountaineers, and Access Fund appreciate this opportunity to provide comments during the scoping period for the Spacewall Climbing Management Area EA now underway in NCNP. We applaud the NPS for their efforts to assess the possibility of climbing access and designating a CMA at Spacewall. We look forward to working with park planners on finding solutions to climbing management issues that steward the environment, enhance the visitor experience, preserve access, and protect Indigenous cultural and sacred sites.

Washington Climbers Coalition

The Washington Climbers Coalition (WCC) is an all-volunteer 501(c)3 organization whose mission is to make Washington a better place for all to climb through advocacy, stewardship, and education. The WCC engages climbers, conservation and recreation organizations, land managers and other relevant stakeholders to protect and preserve access to the places we climb. The WCC is comprised of a volunteer board of directors, local and regional chapter and affiliate leaders, partner organizations like the Mountaineers, Access Fund and the American Alpine Club and members from across Washington State.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing - rock climbing, ice climbing, mountaineering, and bouldering - the Access Fund is a US climbing advocacy organization with over 20,000 members and 123 local affiliates. Access Fund provides climbing management

expertise, stewardship, project-specific funding, and educational outreach. For more information about Access Fund, visit www.accessfund.org.

Leavenworth Mountain Association

Leavenworth Mountain Association is a climbing advocacy and stewardship non-profit organization (501c3) and Local Climbing Organization with the Access Fund. Our mission statement: Climbers supporting Leavenworth's canyons and mountains through stewardship, education, and partnership.

The Mountaineers

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,600 skilled volunteers lead 3,200 outdoor education trips and courses annually for 14,000 members. Mountaineers youth programs provide over 10,000 opportunities each year for children to get outside. The Mountaineers is a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

Comments

We appreciate the opportunity to provide input on this Climbing Management Area EA. WCC and Access Fund submitted a request to include Spacewall in a CMA in 2017. The area, known colloquially as the “Space Wall”, is located east of the Falls Creek Embayment Ditch at approximately mile marker 122 off Hwy 20 and is located between two of the currently designated CMAs (the Diablo Crag and the Newhalem Crag) This clean 300 foot tall rock face is clearly visible from the highway, and has caught the attention of many climbers. With the growing popularity of rock climbing in the vicinity of North Cascades National Park, this area holds great potential to expand and improve the sport climbing opportunities in the Upper Skagit Valley. We strongly support and encourage an alternative that allows this area to be opened as a new CMA.

Visitation in Ross Lake Recreation Area has increased significantly in recent years. Visitation for all sorts of recreation has grown and sport climbing is an activity the park allows in the Ross Lake Recreation Area, and has approved three other climbing management areas (CMAs). Existing CMAs are Newhalem Walls (Ryan’s Wall and Newhalem West), Newhalem Town Walls, and Diablo Wall. North Cascades National Park has long been a celebrated piece of climbing culture and history. We continue to see the growth of sport climbing as a distinct discipline from the traditional climbs that exist in the alpine peaks in NCNP, however many alpine climbers train

on sport routes where the reliable protection of a bolt allows for more users to climb more safely. The relationship between NOCA and the climbing community grew through the process creating the Ross Lake Recreation Area General Management Plan, and we look forward to continuing working together to manage the resources and the people recreating.

Climbing Management Area

Ross Lake National Recreation Area (RLNRA) was established by Congress on October 2, 1968 “in order to provide for the public outdoor recreation use and enjoyment of portions of the Skagit River and Ross, Diablo, and Gorge Lakes, together with the surrounding lands, and for the conservation of the scenic, scientific, historic, and other values contributing to public enjoyment of such lands and waters” (82 Stat.926) (Public Law 90-544).¹ Spacewall is within the RLNRA and should be reviewed as a public outdoor recreation resource for sport climbing. We find the proposed boundaries appropriate. The proposed boundaries include areas with existing climbing without expanding impact into new undeveloped areas.

Fixed Anchors and New Routes

A fixed anchor is typically defined as any piece of climbing equipment left behind by the climber to facilitate the safe ascent or descent of a formation. Fixed anchors are an irreplaceable part of the climbing toolkit without which climbing at Spacewall would be limited due the rock features available. In addition according to the Ross Lake Recreation Area General Management Plan²

‘NPS will allow new routes that require placement of fixed anchors and replacements within designated Climbing Management Areas (CMAs)’.

If Spacewall is designated a new CMA we are dedicated to creating a process with the NPS for any future route development at Spacewall. Any additional permitting process to install a new climbing route should be well defined with distinct timelines for response. It is important to craft a permit process that reduces administrative burden for both NPS staff and the climbing community.

There are other examples of permit processes to install new routes at other NPS managed parks. These primarily are administered through a Special Use Authorization Permit with a 30 day turn around. Both Joshua Tree National Park and City of Rocks use some form of this process to review natural and cultural resource impacts for proposed new routes. It should also be noted that both these Parks review zones or entire formations instead of every individual route, this saves time for all parties and ensures resource protection for the area.

Fixed anchors often referred to as bolts are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible, or for descents (rappels) that would be otherwise impossible without a fixed anchor. The vast majority of climbers have never

¹ <https://parkplanning.nps.gov/document.cfm?documentID=43172>

² <https://parkplanning.nps.gov/document.cfm?parkID=327&projectID=16940&documentID=47962>

placed a fixed anchor, opting instead to climb established routes, thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor. Fixed anchors, necessitate long-term maintenance. Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently.

Route development of this area has already been undertaken, and includes 20-30 bolted routes, as well as several hundred feet of “Via Ferrata” made of rebar ladders and steel cables providing passage across the rock faces below Spacewall. These ladders allow one to avoid the avalanche path (loose boulder and slabs) that necessitated the WADOT Embayment Ditch after the highway was cleared of a significant landslide in 2003.

This Via Ferrata provides safe access to the base of the Spacewall. This large outcropping of Skagit Gneiss stands out clearly from the North Cascades Highway. It is likely the area has had rock climbing exploration in the past, but after the 2015 Goodell Creek Fire that burnt moss and trees, the approach became much more accessible. Climbing developers have established sport climbing routes along the rock outcropping, placing between 10 and 15 bolts on a given route.

Bolt Replacement and Rebolting

While placing a bolt may need oversight or authorization from park management, the life-critical task of replacing aging, worn, or improperly placed anchors should be open to climbers on an at-will basis. This task adds no new additional impact to climbing areas and is essential for climber safety. As such, we strongly encourage such activity not requiring a permit for bolt-for-bolt anchor replacement. Climbers must be able to make the decision to replace unsafe bolts as needed, both in the field for personal safety, and preemptively for zones where bolts are reaching the end of their lifespans. The optimal tool for safely replacing old bolts is a power drill. Using these modern tools could drastically increase the rate of anchor replacement and be highly beneficial to the safety of the climbing public. Current fixed anchors installed at Spacewall are modern stainless steel and were installed using best current practices, we do not anticipate any immediate need for rebolting.

Hardware Standards

Modern standards for bolts specify a minimum of $\frac{3}{8}$ ” diameter and 2.5” in length, made of stainless steel (both hanger and bolt to avoid mixing metals), manufactured or sold by a brand commonly accepted for climbing use (i.e. Fixe, certain Powers bolts, Petzl, Metolius, etc.). Visual impacts from fixed anchors can be minimized by camouflaging the bolt and hanger to match the rock. Varying environments will have varying needs in terms of hardware. For more details on hardware standards accepted by the climbing community, consult the American Safe Climbing Association webpage: <https://safeclimbing.org/new-anchor-guidelines>. Best available bolting techniques and hardware should always be used.

Bouldering

Bouldering has exploded in popularity alongside sport climbing in recent years. As an extremely accessible form of climbing, bouldering has brought many into the climbing community into outdoor spaces. While free of fixed anchors, bouldering presents its own impacts, typically in the form of flattened vegetation at the base of boulder problems due to crash pads and repeated falls. Standards and guidelines for bouldering should be similar in spirit to those for other forms of climbing - in other words, broadly permissive, with restrictions where specific, sensitive resources or sites come into the equation. Where rare plant species may grow at the base of a boulder problem, or where Indigenous cultural sites may be present, bouldering (like all forms of climbing) should be managed appropriately to mitigate impacts, in a targeted and specific manner. A robust education campaign is critical to mitigating bouldering impacts.

Access Routes

The largest impact stemming from climbing recreation is often not a result of the act of climbing itself, but rather from the approach to and descent from the crag. Because so many climbing areas are off designated trails, it is rare for official park trails to go to the cliff bases or boulders climbers seek to access. As such, user-created social trails have sprung up, which can lead to braided/redundant trail systems, erosion, trampling, and other resource impacts. We encourage the NPS to evaluate all current access paths and approaches in the EA to ensure future stabilization work can be conducted without further NEPA analysis.

These trails are essential for climbing access. We commit to working with the NPS to identify essential climbing access trails, stabilize them where necessary to avoid further impacts, bring such trails into the official trail inventory, and close any remaining redundant or inappropriate trails. Access Fund has collaborated with the NPS for over 25 years on mitigating social trails, and is ready, willing, and able to assist with optimizing the Spacewall climbing approach system, and have extensive local knowledge of the critical access points.

Natural Resource Protection

Climbers are very much an environmentally-conscious group. A widespread commitment to conservation, extremely high compliance rates for seasonal raptor closures, and many hours of volunteer time devoted to stewardship all attest to the desire climbers have to protect the places they love to climb in. As such, we strongly support appropriate measures to safeguard flora and fauna from recreational impacts. Doing so falls in a spectrum from general education about LNT practices to targeted closures of sensitive areas. We support site specific management based on quantifiable surveys and data, and are happy to work with the park on devising management strategies and communicating regulations to the climbing community.

[Access Fund's handbook on raptor management](#) was recently published. The handbook is the result of years of effort to compile every relevant article related to managing recreation,

specifically climbing, in raptor habitat, and it includes a 20 page reference list in Appendix A (a living document that is linked to the handbook). The handbook was reviewed and edited by Hawkwatch International, United States Fish and Wildlife Service, and NC Wildlife Resources Commission. It represents the latest knowledge base and mitigation models for protecting raptors. We suggest that NCNP utilize the most current, science-based models for protecting nesting raptors.³ In addition WCC and Access Fund already collaborate with NCNP⁴ conducting monitoring of raptors in other CMA's in the park and commit to the same at Spacewall if needed.

We are also ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the NPS may require to provide for sustainable climbing opportunities in the park. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team, which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.^{5,6}

Human Waste

Improper disposal of human waste is a growing issue across all recreation user groups. Human waste disposal is a significant issue in backcountry settings which are far from vault toilets. Access Fund generally recommends in high use areas and or areas with fragile habitats that climbers use ReStop or Wag bags and back out their waste.⁷ In many climbing areas a bag dispenser is placed somewhere on the approach with a signage providing instructions for climbers to use the bags and pack it out when they leave. We have seen a lot of success with this strategy and it is becoming commonplace for many climbing areas. WCC and Access Fund are prepared to assist with finding solutions to human waste.

Indigenous Communities

We strongly support efforts by both the park and climbers to partner with and support the Indigenous communities that count NCNP among their traditional lands. We acknowledge the place currently known as North Cascades National Park as the ancestral lands of the Upper Skagit Indian Tribe, Sauk-Suiattle Indian Tribe, Swinomish Indian Tribal Community, and Nlaka'pamux Nation. Protecting Indigenous cultural and sacred sites is a crucial aspect of this proposed CMA. Where climbing poses a risk to such places, we support mitigation measures appropriate to the scenario, whether that means education for recreationists, rerouting an approach trail, closures, or other methods. We are eager to work with the park and the local

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<https://d1w9vyym276tvm.cloudfront.net/assets/Access-Fund-Raptor-Handbook.pdf?mtime=20210603122128&focal=none>

⁴ <https://www.accessfund.org/news-and-events/news/newhalem-seasonal-raptor-closure-starts-march-1st>

⁵ <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

⁶ <https://www.accessfund.org/pages/conservation-team>

⁷ <https://www.accessfund.org/learn/the-climbers-pact/poop>

climbing and tribal community to discover ways that climbers can be better allies to tribes, and welcome any opportunities to learn from the Indigenous community.

Education and Communication

Education is a constant need for climbing destinations like NCNP, both in terms of LNT principles to prevent resource impacts, and also in terms of climbing best practices to avoid social impacts as well as search and rescue incidents. We are more than willing to contribute time and energy to additional educational efforts the park may wish to explore. Between our local and national resources, we are well-equipped to partner with the park and find innovative solutions to ensure users are well-equipped with the knowledge and skills they need to recreate sustainably, safely, and with respect for cultural resources. Our organizations can assist in sharing crucial information including seasonal closures on our social media platforms as well as Mountainproject.com.

Justice, Equity, Diversity, and Inclusion (JEDI)

We urge NCNP to work with the local community to advance inclusive and equitable access to the park and its recreational opportunities. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area located in a diverse community, as well as within a short drive of one of the largest and most diverse urban centers in the nation, NCNP should be accessible to people from a true diversity of backgrounds. Access Fund has staff and/or members dedicated to JEDI issues, and are more than willing to offer our time and resources to assist the park in applying JEDI principles to their work on the CMP. The climbing community has embraced JEDI, and individuals, organizations, and land managers across the country are committing themselves to a vision of a more diverse and equitable future for the lands they love. We strongly believe that JEDI has a role to play in climbing management, and are eager to support the park in their own JEDI journey.

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Thank you for your consideration of these comments on the NPS's scoping process for the North Cascades NPS Spacewall Climbing Management Area Environmental Assessment Scoping document. WCC, LMA, The Mountaineers and Access Fund have the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. We look forward to continuing to work with the NPS. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone (303) 552-2843) or email (katie@accessfund.org) to discuss this matter further.

Sincerely,



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