

December 14, 2015

Jefferson County Open Space  
Sent via email: [climbing@co.jefferson.co.us](mailto:climbing@co.jefferson.co.us)

## **RE: Jefferson County Open Space Proposed 2016 Seasonal Raptor Closure**

The Outdoor Alliance Colorado (OAC) appreciates this opportunity to comment on Jefferson County Open Space's Draft Climbing Management Guidelines. The OAC is a statewide partnership that serves as a platform for climbers, paddlers, hikers, mountain bikers, and backcountry skiers to coordinate their efforts to protect public lands and waters, and to ensure these places can be experienced in a meaningful and sustainable manner.

The OAC is particularly concerned about the CMG's fixed anchor and raptor closure policies.

### **Fixed Anchors**

The OAC encourages JeffCo to consider the following recommendations from the Access Fund and American Alpine Club's [Policy on Fixed Anchors](#) in the redrafting of the CMG:

- *Fixed anchor maintenance and replacement shall be allowable* for existing fixed anchors.
- *Climbers should bear the responsibility*, in accordance with land management regulations, for determining when and where to place and replace fixed anchors, and how to use these tools.
- *Public input is critically important* for the management of fixed anchors. Climbers need to have a voice in managing key elements of the climbing safety system.
- *Administrative actions regarding fixed anchors should be well substantiated and noticed to the public.* All administrative changes to the condition of fixed anchors (e.g., removal) should be well-publicized to help mitigate potential negative impacts to climber safety.

Like with fixed anchor decisions, fixed draw decisions should be established with input from the climbing community.



## Raptor Management Strategy

Clear Creek is among many rivers in Colorado our members value highly, and based on the information provided by JeffCo, the proposed Seasonal Raptor Closure could potentially lead to the complete closure of two sections of the creek during the 2016 paddling season:

- 1) The **Narrows (class IV-V)** is in the vicinity of the New River and Highlander crags. This area is a steep gorge and depending on the nest(s) locations, the river and rapid may not be visible, though still within the proposed closure radius.
- 2) The **Screaming Quarter Mile rapid (Class IV)**, along with the parking area located at the start of that rapid, is in the vicinity of Stumbling Block and Blonde crags. This area is heavily treed and has a steep river bank. Again, depending on where the nest(s) are located, river-based activities may not be visible.

While the OAC supports reasonable climbing closures to protect raptor habitat and the timely removal of those restrictions, we are concerned with the possibility that the seasonal closures would include kayaking and rafting from February 1<sup>st</sup> to July 31<sup>st</sup>.

We ask that the raptor management strategies lift any proposed restrictions on kayaking and rafting activities that take place at water level. In contrast to highway traffic, and activities that make direct contact with nesting habitat, river-based recreation has a minimal impact on raptors and other wildlife.

Thank you for your consideration.

Sincerely,

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