



Protect America's Climbing

November 18, 2016

Director John Jarvis
National Park Service
1849 C Street, NW
Washington, DC 20240

RE: Access Fund comments on DRAFT Director's Order #100

Dear Director Jarvis,

The Access Fund appreciates this opportunity to provide comments on the DRAFT *Director's Order #100: Resource Stewardship for the 21st Century* (DO#100). The National Park System includes some of the most iconic climbing resources in the world, and the Access Fund, as well as the greater climbing community, considers climbing in national parks a great privilege that is worth protecting and enhancing.

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit 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 the largest US climbing advocacy organization with over 13,000 members and 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, refer to the active [Memorandum of Understanding with the NPS](#) and visit www.accessfund.org.

COMMENTS

The Access Fund highly values natural resource protection. We believe that a healthy environment is fundamental to the integrity of climbing resources; therefore, we support well-substantiated, science-based resource stewardship. We also believe that continued support for the National Park System, and conservation in general, depends on positive experiences in natural landscapes. In other words, we believe that the future of our public lands is dependent on whether Americans will be able to participate in appropriate recreation activities. Access Fund acknowledges that successful resource protection and stewardship is complex and that management decisions often include a degree of uncertainty; however, it is equally critical that the same management decisions balance the needs of visitors and the future of our public lands.

NPS Management Policies, section 1.5, states that, “when proposed park uses and the protection of park resources come into conflict, park managers are obligated to ensure that the purposes for which the park was created are not diminished.” Access Fund supports this policy and highly

values well-protected recreation resources that are managed for appropriate and legitimate uses. We also believe that DO#100 may impede appropriate uses and decrease public participation in stewardship, education and partnership initiatives. Access Fund is concerned about the decision-making process, not specific outcomes. We accept well-substantiated, science-based decisions that integrate public input and common sense.

The reason why DO#100 has the potential to harm existing partnerships and result in unnecessary restrictions on appropriate activities is because of the Precautionary Principle (section 6). The Precautionary Principle would allow land managers to prohibit or restrict appropriate uses if “an activity raises plausible or probable threats of harm to park resources... even when there is uncertainty” (section 6.2). Draft DO#100 states that the Precautionary Principle is intended to be used in concert with the Adaptive Management framework, but in practice, the Precautionary Principle overwhelms to the Adaptive Management framework and limits its greatest benefits and flexibility. Adaptive Management is based on scientific inquiry and the ability to identify and develop a research question that is tested to fine-tune mitigation strategies. The Precautionary Principle limits the benefits and balance of adaptive management as the two concepts are, in part, at odds. The Precautionary Principle forces the Adaptive Management process to first test the most restrictive strategy instead of allowing the adaptive process determine appropriate management strategies that are based on a holistic, although often incomplete, understanding of natural resources, visitor use patterns, historic uses, active partnerships, local economy, and similar issues at other parks. This is especially problematic in designated wilderness where establishing the minimum amount of regulation that would effectively achieve the desired result for managing wilderness is a fundamental principle for managing visitor activities in wilderness.ⁱ This principle is recognized in wilderness management practices as the “minimum regulatory tool.”ⁱⁱ

The Precautionary Principle would support decisions to prohibit lesser-understood activities until future studies elucidate issues of concern. On the surface, this may seem reasonable. But in practice, the Precautionary Principle will harm less represented user groups more frequently than larger user groups. For example, rock climbers are a small minority of National Park System visitors and climbing management is typically lower priority than management issues that affect larger visitor populations. Anecdotal evidence clearly indicates that rock climbing studies and inventories are constantly postponed or never conducted due to understandable limitations associated with funding challenges, staffing shortages and land manager attrition. Therefore, even though rock climbing is considered and “appropriate use”ⁱⁱⁱ, rock climbers commonly experience years of unsubstantiated closures and restrictions while waiting for research to be conducted and management strategies adapted. Examples of this include North Cascades National Park, where a “temporary” bolt moratorium stands until a Wilderness plan revision is completed, at an undefined date. And Sequoia and Kings Canyon National Parks, where poorly developed climbing management policy is awaiting further implementation guidance. Institutionalizing the Precautionary Principle under DO#100 will exacerbate this phenomenon, and very likely result in more unsubstantiated restrictions on appropriate uses like climbing.

The provisions related to the Precautionary Principle in DRAFT DO#100 will protect natural resources, but at the expense of visitor experience, recreation and public lands support. We recommend that DO#100 be revised so that the Adaptive Management framework can be fully exercised, without the limiting burden of the Precautionary Principle, to explore “flexible decision making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Careful monitoring of these outcomes both advances scientific understanding and helps adjust policies or operations as part of an iterative learning process” (National Research Council 2004). Access Fund suggests that the Precautionary Principle be listed as one of several guiding principles that are nested within the Adaptive Management framework, instead of a governing principle that will invariably drive unsubstantiated restrictions and management actions.

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Access Fund appreciates your consideration of these comments. In a political climate where public lands are under attack, we believe that people have difficulty supporting public lands that they cannot experience. In addition, we support well-substantiated decision making and the “minimum regulatory tool” principle. We believe that allowing the Precautionary Principle to be a prominent, guiding rule alongside Adaptive Management will result in unsubstantiated management decisions, increased recreation management conflicts, and loss of support for America’s public, federal lands. Nevertheless, Access Fund will continue to support the National Park System, as we have for 25 years, through climber education, policy recommendations, and resource stewardship.

Sincerely,



Erik Murdock
Access Fund Policy Director

Co-Signed,

Arkansas Climbers Coalition, AR
Climbing Association of Southern Arizona, AZ
Prescott Climbers Coalition, AZ
Action Committee for Eldorado, CO
Arkansas Valley Climbers Coalition, CO
Northern Colorado Climbers Coalition, CO
Telluride Mountain Club, CO
Pikes Peak Climbers Alliance, CO
Rifle Climbers Coalition, CO

Thacher Climbing Coalition, NY
Central Oregon Rocks, OR
Mazamas, OR
Black Hills Climbers Coalition, SD
East Tennessee Climbers Coalition, TN
Southeastern Climbers Coalition, TN/AL/GA
Boone Climbing Coalition, NC
Gunks Climbers Coalition, NY
South Central Pennsylvania Climbers, PA

Foothills Climbing Community, CO
Ragged Mountain Foundation, CT
Boise Climbers Alliance, ID
BETA Fund, IL
Iowa Climbers' Coalition, IO
Mid Atlantic Climbers, MA/D.C.
Clifton Climbers Alliance, ME
Upper Peninsula Climbers Coalition, MI
Western Montana Climbers Coalition, MT
Southwest Montana Climbers Coalition, MT
Carolina Climbers Coalition, NC/SC
The Mountaineers, WA

SW Oregon Climbers Coalition, OR
Friends of Indian Creek, UT
Salt Lake Climbers Alliance, UT
Leavenworth Mountain Association, WA
Washington Climbers Coalition, WA
Wisconsin Climbers Association, WI
Central Wyoming Climbers Alliance, WY
Illinois Climbers Association, IL
Mondadnock Climbers Association, NH
Southern Nevada Climbers Coalition, NV
Friends of the Ledges, NH

ⁱ Hendee, J. C., Stankey, G. H., & Lucas, R. C. (1990). *Wilderness Management*. Golden, CO: North American Press.

ⁱⁱ National Wilderness Steering Committee (2006). Guidance White Paper #3, *Minimum Requirements Decision Process*. National Park Service.

ⁱⁱⁱ *Director's Order #41: Wilderness Stewardship*, Section 7.2, National Park Service, US Department of the Interior (May 13, 2013).