



November 12, 2009

Thomas B. Lyons
Director, Resource Management
NYS Office of Parks, Recreation and Historic Preservation
Agency Building One, Empire State Plaza
Albany, NY 12238
Minnewaska.Plan@oprhp.state.ny.us

**RE: ACCESS FUND COMMENTS TO THE DRAFT MASTER PLAN FOR
MINNEWASKA STATE PARK PRESERVE**

Dear Director Lyons,

The Access Fund welcomes the opportunity to provide comments to the Draft Master Plan for Minnewaska State Park Preserve.¹ Please consider these comments when finalizing the Master Plan. The Access Fund urges the New York State Office of Parks, Recreation & Historic Preservation to expand the scope of this Master Plan to authorize future climbing opportunities within the park as additional specific locations are studied for sensitive species and safety protocols are established. The Draft Master Plan's preferred option to only expand climbing opportunities to Dicke Barre unnecessarily restricts potential managed climbing opportunities elsewhere in Minnewaska State Park Preserve. Despite the OPRHP policy of permitting passive recreation such as climbing, the Draft Master Plan would continue the largest public land climbing prohibition in the country. This Master Plan can both protect resources while also allowing climbing access to limited locations at Minnewaska State Park Preserve (MSPP).

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 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 15,000 members and affiliates. Many of our members live and climb in New York and have a direct interest in recreational access at Minnewaska State Park Preserve. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

The banned climbing areas within Minnewaska State Park Preserve represent the largest climbing closure of public land in the country, and this draft proposal poorly serves New



York taxpayers and local businesses that rely on tourism. Minnewaska State Park Preserve should acknowledge the best management practices used across the country and develop policies that protect sensitive and rare resources while also serving the needs of local taxpayers who seek responsible use of public lands.

The Draft Master Plan states that the “Preserve is managed to support and promote its designation through the use of education, interpretation, biodiversity management strategies as well as low impact development and recreational activities.” Yet this plan provides no process to even analyze whether additional passive recreation such as climbing, could access the Park’s miles of cliff line without affecting sensitive resources.

The Master Plan for Minnewaska State Park Preserve should authorize a future process to map climbing locations and compare that information with biological data collected by the Office of Parks, Recreation & Historic Preservation. MSPP should then develop a comprehensive climbing plan for the Park that establishes a protocol to incrementally analyze new areas for future passive climbing access.

Park Preserve Planning at Minnewaska and the 2009 Master Plan

The mission of the New York State Office of Parks, Recreation & Historic Preservation (OPRHP) is to provide safe and enjoyable recreational and interpretive opportunities for all New York State residents and visitors, and to be responsible stewards of valuable natural, historic and cultural resources. OPRHP’s vision and goals for the Minnewaska State Park Preserve are guided by New York law and the 1993 Master Plan which seeks to uphold the preservation, recreation and environmental education values of the Park Preserve.

With the adoption of the 1993 Master Plan, Minnewaska was designated a Park Preserve under Article 20 of New York State Parks, Recreation and Historic Preservation State Law. This law allows the Commissioner of OPRHP to designate Park Preserves which possess outstanding ecological values that are unique or rare in the State. Article 20 also directs the State to maintain the integrity of these sites while also providing for “appropriate passive recreational facilities.” Accordingly, Minnewaska State Park Preserve was established to protect the distinct ecological diversity of the Shawangunk Ridge, but as required by New York law, passive recreation must also be considered at Minnewaska.

Article 20 outlines what qualifies as “passive recreation”: horseback riding, fishing, hiking, nature study, and photography “provided that such uses are compatible with the long-term protection of the ecological and historical resources that merited designation of the park preserve or park preservation area.” As an activity, climbing also fits this class of “appropriate passive recreation” because when managed correctly passive climbing



can easily be compatible with the long term protection of Park resources. This point has been proven by MSPP’s own history of successful climbing management at Peter’s Kill.

The Draft Master Plan outlines specific inventory, monitoring and research goals with an overall goal to encourage new and continue ongoing studies and data analysis that will enhance and protect the Park Preserve.² In so doing MSPP pledges to:

- Continue cooperative research and data collection partnerships,
- Monitor the impact of recreation on natural resource preservation goals, and
- Provide a coordinated approach to inventory, monitoring and research that facilitates data exchange.

All of this work should “promote research that complements the other goals for the Preserve” such as providing passive recreation.

MSPP’s planning goals—“to preserve and protect the natural, cultural and physical resources of Minnewaska State Park Preserve while making available to the public compatible recreational and educational opportunities”—are defined by the Park Preserve’s specific classification and goals. Minnewaska’s planning category falls within the Park Preserve subcategory classification requiring that management focus be the conservation of MSPP’s natural attributes and its environmental research and educational opportunities. However, MSPP “may also provide for limited recreational use based upon the carrying capacities of the resource base and other program considerations.”³

Master Plan goals also support a broader look at Minnewaska’s climbing potential because of its status as passive recreation.⁴ Specific to recreational access, the Master Plan should, among other things

- Provide appropriate public recreational opportunities, compatible with the character of the Preserve and its resources, to areas designated for public use,
- Implement programs and facilities that are consistent with regional and local needs and demands, and
- Continue to evaluate carrying capacities and provide access for appropriate recreational opportunities such as climbing.

Accordingly, in order to fulfill its obligation to consider passive recreation use along with resource conservation, MSPP should undertake a more robust analysis that considers the management of limited passive climbing opportunities at other locations in the Park Preserve.



Model State Lands Climbing Management

Parks and other state lands across the country routinely offer climbing opportunities, including New York.⁵ Many parks and other state lands around the country⁶ allow climbing. Many natural and wildlife preserves around the country also balance resource protection with permitted climbing access. These areas include:

- Adirondack Forest Preserve, NY⁷
- McDowell Sonoran Preserve, AZ⁸
- Mount Si Natural Resources Conservation Area, WA⁹
- Hawkins Preserve, CO¹⁰
- Little River Canyon National Preserve, AL¹¹
- Red Rock Canyon National Conservation Area, NV¹²
- Wichita Mountains Wildlife Refuge, OK¹³

Given the appropriate acceptance of low impact climbing as a permitted use on state and federal public lands throughout the country, including New York State, there is ample precedent for Minnewaska State Park Preserve to expand climbing in the Park at locations where there exists no specific resource-based justification for restrictions.

Preferred Option 2 Improperly Ignores Potential Passive Climbing Access

The Draft Master Plan acknowledges that permitted recreational activities in MSPP focus on its spectacular lakes, topography, and overall wilderness character. Further, the “dramatic precipices and rock formations found at the Peter’s Kill climbing area represent a resource for some of the best rock climbing in the northeastern United States.” While the climbing at Peter’s Kill is popular and high quality, it represents a very small percentage of the climbing potentially available in the rest of the Park, especially in the backcountry. Indeed, the wilderness climbing experiences available at Minnewaska could provide outstanding unique experiences for New Yorkers and other visiting climbers that typically do not recreate in wild backcountry environments. Unfortunately, OPRHP ignores what could be some of the most unique climbing opportunities in the region.

The “Preferred Option 2” in the Minnewaska State Park Preserve Draft Master Plan will expand rock climbing opportunities to the Dicke Barre area, adding only thirty new climbing routes and twenty to thirty new bouldering opportunities to the adjacent Peter’s Kill climbing area. Although a cliff face biological survey was conducted that found the sensitive Mountain Spleenwort, the Master Plan’s Option 2 would mitigate impacts “through the use of OPRHP staff monitoring and educational efforts.” Appropriate signage would be installed to inform users about the sensitive resources and explain climbing policies. Under Option 2 this information would be provided in promotional and



permitting materials and the Climbing Management Plan which would be updated in 2010 to include the Dicke Barre area and recent cultural and natural resource surveys.

Apparently, OPRHP's restrictive Option 2 planning alternative is preferred because:

- Climbing at Dicke Barre fits existing management capabilities, and current access for safety and rescue extrications,
- Expanding climbing to the Dicke Barre area allows for the activity to be safely managed and monitored from the Peter's Kill office, and
- Potential impacts to the Preserve will be controlled through a limited access system, constrained by the parking capacity of the Peter's Kill parking lot.

However, this rationale for a limited expansion of climbing ignores other alternatives available that better fit New York law and specific MSPP planning goals. Controlled climbing access that is added incrementally in phases to the MSPP Climbing Management Plan could use the existing permit process based from the Peter's Kill office. The carriage road immediately above much of the climbing in the park actually provides more direct rescue access than what's available at Dicke Barre (where a trail is considered adequate for safety and rescue operations in the Master Plan's Preferred Option 2). Indeed, the carriage roads at Minnewaska would provide highly effective emergency routes that are greatly superior to those available at the hundreds of state and federally-managed climbing areas around the country. And as with the Peter's Kill and Dicke Barre crags, a limited number of permits and parking spaces will provide controls to effectively manage and monitor incremental increases in climbing use in the Park.

The options outlined by OPRHP for Minnewaska's Master Plan represent extremes, both in terms of climbing opportunities and perceptions regarding management challenges that would result from increased climbing access at Minnewaska. On the one hand, Preferred Option 2 fails to adequately address the stated planning goals and general mandate of a New York Park Preserve by unnecessarily restricting passive recreation. On the other hand, Option 3 as outlined in the Draft Master Plan—"allow climbing throughout the Preserve"—is obviously set up to fail because it would not adequately protect MSPP resources. Predictably, OPRHP discounted Option 3 because of "operational constraints pertaining to the permitting process" and the "greater potential impact to rare species and communities." OPRHP also cites expanded safety and rescue operations as a reason to limit climbing expansion in the Park despite the fact that MSPP has superior emergency response access routes to nearly every other climbing area in the country. Accordingly, MSPP should analyze a more balanced Option 4 that would allow permitted passive climbing throughout Minnewaska only in areas where there are no conflicts with the values for which the Park Preserve was established.



Minnewaska State Park Preserve Should Develop a More Balanced Option 4

Considering that the Master Plan does not offer a reasonable range of planning alternatives, the OPRHP should consider a fourth possibility that could open permitted climbing access to limited areas in the Park Preserve. Potential areas could receive a cliff face biological survey for sensitive species, such as was conducted for Peter’s Kill and Dicke Barre, and if no unacceptable impacts are likely then that new area could be incorporated into the Park’s Climbing Management Plan and permitted climbing could occur subject to ongoing monitoring.

Analyzing Minnewaska’s potential for passive climbing opportunities fits Master Plan goals to “continue cooperative research and data collection partnerships, monitor the impact of recreation on natural resource preservation goals, and provide a coordinated approach to inventory, monitoring and research that facilitates data exchange.”¹⁴ Recent comprehensive studies prepared by OPRHP¹⁵ and the Shawangunk Ridge Biodiversity Partnership (SRBP)¹⁶ surveyed Minnewaska to better understand and protect open space and rare species and ecological communities.¹⁷ These projects have used GIS/biodiversity data to identify areas along the Minnewaska Ridge that are top priorities for protection due to their “natural, scenic, recreational, or open space values.” To accomplish Master Plan goals, the OPRHP should compare this information to desired climbing zones, and consider permitted passive climbing access through a similar management protocol as used at Peter’s Kill.

Just as with the Peter’s Kill and Dicke Barre climbing areas, an Option 4 could authorize additional field evaluations of natural and cultural resources to inform future management of other climbing locations in the Park, and include a process to add these new locations to the 2010 update to the Climbing Management Plan (which should be elevated in this Master Plan to Priority 1 and completed in 5 to 10 years). The Access Fund can provide resources to retain environmental consultants and climbers—of the MSPP’s choosing—to map the most desirable climbing zones, and compare those specific areas to the studies conducted by OPRHP and SRBP. This type of balanced planning alternative would allow permitted climbing to occur without causing unacceptable impacts to the ecological and historical resources that merited the designation of Minnewaska State Park Preserve in the first place.¹⁸ Incremental access authorized zone-by-zone has been planned for and implemented at state parks elsewhere in the US.¹⁹ There is no reason that similar adaptive management techniques could not be used at Minnewaska State Park Preserve.



Minnewaska's New Property Additions Should Be Analyzed for Passive Recreation Opportunities

Since 2003 the State added more than 8,000 acres to MSPP, much of which also contains both "rare and endangered species" and extensive climbing opportunities.²⁰ This Master Plan should provide management direction that authorizes research projects to ensure the conservation mandate of these properties "while keeping them open for passive recreation." Unfortunately the Draft Master Plan fails to address whether any additional passive climbing opportunities may be possible through future field studies of these newly-owned public parcels.

Of particular interest is Sam's Point, an area of significant climbing potential which is managed by The Nature Conservancy (TNC) through an agreement with OPRHP. TNC's management plan for Sam's Point (retained from the time before it was acquired by New York State) permits hiking, hunting, skiing, snow-shoeing, environmental education and research. However, non-permitted activities include camping, hang-gliding, mountain biking, rock and ice climbing, swimming and trapping, and the use of off-road vehicles, snowmobiles and horses. Of the banned categories, passive climbing activity best fits Minnewaska's mandate to provide appropriate recreational opportunities that do not conflict with the conservation focus of the Park Preserve. Just as with the entire Minnewaska State Park Preserve management area, the Master Plan should consider which specific locations within these new property additions might provide unique passive climbing opportunities without harm to conservation programs.

The Master Plan Should Address the Regional Demand for Camping

A key part of the climbing experience in the Mohonk/Minnewaska area is the opportunity to camp. However, like the climbing resources in the region, campsites are similarly scarce. The MSPP 1993 Master Plan designated Jenny Lane as a camping area, yet this area remains an undeveloped combination of forest and small fields. Goals for the current Master Plan include providing categories of low impact passive recreation commensurate with local demand and as outlined in New York's Statewide Comprehensive Outdoor Recreation Plan (SCORP).²¹ Both of these indicators call for more camping, and the construction of the Shawangunk Gateway Campground will meet the demand for camping in the region.

The Access Fund supports Draft Master Plan provisions that propose the construction of the Shawangunk Gateway Campground (currently in the design phase) on a non-contiguous forty-five acre parcel located along Highway Route 299 in the Town of Gardiner. This primitive tent campground will provide much needed campsites (26 drive-in and 24 walk-in sites) for both Minnewaska and Mohonk Preserve visitors. We support the efforts of our partner the American Alpine Club in their work with the State and



other local stakeholders to acquire and manage this much-needed property. However, the Access Fund urges OPRHP to elevate this project to Implementation Priority 1 and complete construction in 5 to 10 years instead of Priority 2 (which has less certain funding and a much longer timeline for completion). The Shawangunk Gateway Campground project received a field evaluation for prehistoric and cultural resources, and no significant resources were found on the property. The Shawangunk Gateway Campground is an important and long-overdue project that benefits significantly from key contributions by MSPP partners and stakeholders. There is no better time for OPRHP to take advantage of this support and complete the campground project as soon as possible.

CONCLUSION

The Access Fund urges OPRHP to adopt more progressive management policies for Minnewaska State Park Preserve that both protects its unique environment and allows for controlled passive climbing opportunities. Nearly all federal and state parks and forests around the country allow managed climbing access, and many preserves do as well including the New York's Adirondack Forest Preserve. The limited expansion of climbing opportunities outlined in the Draft Master Plan fails to fulfill the mandate of New York's Article 20 and ignores the stated planning goals of the Master Plan

The limited expansion of climbing to only Dicke Barre is insufficient considering that the thirteen-year pilot project at Peter's Kill is a proven model that could be applied at limited areas around MSPP with additional management provisions incorporated into the planned 2010 climbing plan. Instead of a comprehensive ban throughout the park, the OPRHP should use this current Master Plan to authorize a future process that analyzes potential climbing areas in the park on a zone-by-zone basis to determine whether passive climbing and sensitive resources can coexist. Once zones are cleared, the 2010 Climbing Management Plan could allow for future managed climbing access. This kind of incremental adaptive management plan has been applied elsewhere with success, and OPRHP should provide New Yorkers with a similar opportunity.

The Access Fund and local New York climbers stand ready to assist MSPP in every effort to survey Minnewaska State Park Preserve for sensitive species and outstanding climbing opportunities, and devise a climbing plan that would ensure that recreation and resource protection can co-exist. We look forward to working with you on the Master Plan for Minnewaska State Park Preserve. Please contact me if you have any questions or need any assistance from the Access Fund.



Sincerely,

Jason Keith
Access Fund Policy Director

Cc: John Bonacic, New York State Senate
Kevin A. Cahill, New York State Assembly
Clifford W. Crouch, New York State Assembly
José M. Serrano, New York State Senate, Chair, Senate Cultural Affairs, Tourism,
Parks & Recreation Committee
Carol Ash, Commissioner, New York State Office of Parks, Recreation and
Historic Preservation
Gunk Climbers Coalition, Steering Committee
Glenn Hoagland, Mohonk Preserve Executive Director
Hank Alicandry, Mohonk Preserve
Brady Robinson, Access Fund Executive Director

¹ The Access Fund's 2008 Scoping Comments to the Draft Master Plan for Minnewaska State Park Preserve can be found at http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/NY--Minnewaska_8.5.2008.pdf

² See Minnewaska State Park Preserve Master Plan: Chapter 4 – Vision and Goals - <http://nysparks.state.ny.us/inside-our-agency/documents/MasterPlans/MinnewaskaStatePark/MinnewaskaStateParkChapter4.pdf>.

³ See Minnewaska State Park Preserve Master Plan: Chapter 5 – Analysis and Alternatives, Park Classification - <http://nysparks.state.ny.us/inside-our-agency/documents/MasterPlans/MinnewaskaStatePark/MinnewaskaStateParkChapter5.pdf>

⁴ Minnewaska State Park Preserve Master Plan: Chapter 4 – Vision and Goals - <http://nysparks.state.ny.us/inside-our-agency/documents/MasterPlans/MinnewaskaStatePark/MinnewaskaStateParkChapter4.pdf>.

⁵ Adirondack Park State Land, NY – <http://www.dec.ny.gov/outdoor/7870.html>, http://www.dec.ny.gov/docs/lands_forests_pdf/giant1.pdf, http://www.dec.ny.gov/docs/lands_forests_pdf/giant1.pdf

⁶ For example, see Eldorado State Park, CO (<http://parks.state.co.us/Parks/EldoradoCanyon/ParkActivities/RockClimbing>, <http://www.aceeldo.org/brochure>); Castle Rocks State Park, ID (<http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E->



[C275DF6CA8E3}/Castle%20Rocks%20Climbing%20Management%20Plan%20final.pdf](#)); City of Rocks State Park, NM (http://www.emnrd.state.nm.us/PRD/documents/CRSPMPlanDraft102606_000.pdf); Crowder's Mountain State Park, NC (http://www.crowdersmountain.com/v1/climbing_rules.asp); Foster Falls State Park, TN (<http://www.seclimbers.org/modules.php?name=Content&pa=showpage&pid=31>, http://www.trailsedge.com/climb/foster/foster_rules.htm); Willoughby State Forest, VT (<http://www.vtfpr.org/lands/willoughby/wilplan.pdf>); Beacon Rock State Park, WA (<http://www.mrpton.com>); and Cooper's Rock State Park, WV (<http://www.coopersrockclimbers.org>, <http://www.wvforestry.com/coopersrockstateforest.cfm>).

⁷ <http://www.dec.ny.gov/lands/5263.html>

⁸ http://www.mcdowellsonoran.org/other_rec_climbing.html

⁹ http://www.dnr.wa.gov/Publications/amp_mt_si_nrca_mgt_plan_1997_2.pdf

¹⁰ http://www.cortezculturalcenter.org/hawkins_climbing_app.pdf

¹¹ <http://www.nps.gov/liri/faqs.htm>

¹² http://www.blm.gov/nv/st/en/fo/lvfo/blm_programs/lvfo_recreation/rock_climbing.html

¹³ <http://www.fws.gov/SOUTHWEST/REFUGES/oklahoma/wichitamountains/rockclimbing.html>

¹⁴ Minnewaska State Park Preserve Master Plan: Chapter 4 – Vision and Goals - <http://nysparks.state.ny.us/inside-our-agency/documents/MasterPlans/MinnewaskaStatePark/MinnewaskaStateParkChapter4.pdf>.

¹⁵ Smith, K.J. and J.A. Lundgren. "Rare Species and Ecological Communities of Minnewaska State Park Preserve." Prepared for NYS Office of Parks, Recreation and Historic Preservation by New York Natural Heritage Program. Unpublished Report. March 2009.

¹⁶ http://www.gunksfireplan.org/files/srbp_general.pdf,
<http://www.mohonkpreserve.org/pdf/Community.pdf>

¹⁷ A New York Natural Heritage Program identified 32 distinct ecological community types representing five classification systems and twelve subsystems.

¹⁸ Much of this information can already be gleaned from the map on page 31 of the Master Plan's Chapter 3 which shows slope and topography within the Park.

¹⁹ For example, see the inter-agency climbing management plan for Idaho's Castle Rocks State Park: <http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/Castle%20Rocks%20Climbing%20Management%20Plan%20final.pdf>

²⁰ Including Sam's Point, Ellenville Tract, Awosting Reserve, and the Shevchenko, Warwarsing, Deiner, Truchan, and Oleksiw properties.

²¹ <http://nysparks.state.ny.us/recreation/trails/statewide-plans.aspx>