

VIA EMAIL

December 19 2008

Superintendent Martha Bogle
Shenandoah National Park
Attention: ROMP EA
3655 U.S. Highway 211 East
Luray, VA, 22835

**Re: Access Fund Comments to the Draft Shenandoah National Park Rock
Outcrop Management Plan Environmental Assessment/Assessment of Effect**

Dear Superintendent Bogle:

The Access Fund welcomes this opportunity to provide comments to the Shenandoah National Park Rock Outcrop Management Plan (ROMP) for Shenandoah National Park (SHEN), and applauds this effort to provide alternatives for reasonable and effective management direction for Shenandoah National Park's backcountry climbing resources. We support the ROMP goals that seek to mitigate impacts of visitor recreation, accommodate visitor use, and direct the future management of "rock outcrops" in SHEN. The Access Fund looks forward to working with the NPS to protect rock outcrops while still providing opportunities for visitor enjoyment of these resources.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rock climbers 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.

The Access Fund has a proud record of conservation work and climber activism in Virginia¹ and a significant number of our members live and climb in Virginia and Shenandoah National Park in particular. The Access Fund supports reasonable and effective climbing management policies for this area and we would like to offer assistance towards any future management planning initiatives that involve climbing. The Access Fund has assisted land management agencies in climbing management and general planning initiatives in the following ways:

- Advice on visitation, use patterns, and climbing techniques and tools.
- Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletter.
- Helping conduct and/or undertake surveys of climbing activity to determine management preferences.
- The Access Fund Climbing Preservation Grant program provides funds three times yearly for research, monitoring, educational outreach, and stewardship projects at climbing areas. Specific components of this ROMP may be appropriate for Access Fund grant support.

The Access Fund recognizes that recreational access must be balanced with proper management, which may include restrictions to protect the natural and cultural resource values and the integrity of the landscape. However, it is important to note that Shenandoah National Park contains some of the most unique, popular, and challenging technical climbing opportunities in the Mid-Atlantic region, and providing for recreational opportunities should be emphasized in the Shenandoah ROMP.

The Access Fund is concerned with the preservation of these opportunities at SHEN, and we provide comments herewith to assess the probable effect of this proposed management initiative and offer ideas to address climbing management solutions. In addition, for a recently updated copy of the Access Fund publication *Climbing Management: A Guide to Climbing Issues and the Production of a Climbing Management Plan*, see <http://www.accessfund.org/pdf/CM-web.pdf>. This publication, two years in the making, has proven helpful to dozens of land managers across the country who work on climbing related issues.

I. INTRODUCTION

Shenandoah National Park has long been one the most outstanding rock climbing areas in the Mid-Atlantic region. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, unique climbing challenges, and relatively convenient

¹ For example, the Access Fund provided comments to proposed plans and Great Falls Park and has worked with our affiliate organization the Mid-Atlantic Climbers Coalition and Friends of Great Falls Coalition on a variety of climbing issues and planning initiatives. We also traveled to SHEN to meet with NPS staff and have discussed various scoping options for the SHEN ROMP since 2004.

access from the Washington, DC area and other metro areas in Virginia. The earliest known technical climbing in the Shenandoah Mountains took place in the late 1930s and early 1940s by members of the Potomac Appalachian Trail Club (PATC). However, rock climbing opportunities are limited at SHEN due to inaccessibility of many rock outcrop sites. Most climbing and bouldering activities in the area occur close to overlooks and rock outcrop sites along Skyline Drive or in the vicinity of the Appalachian Trail. Climbing activity in the Park has increased over the past 20 years, but the number of climbers appears to have leveled off.² Little Stony Man Cliffs is SHEN's most popular climbing area due to its proximity to Skyline Drive, and Old Rag Mountain provides more remote climbing opportunities. There are no officially designated climbing areas or routes in SHEN, and currently climbing remains unmanaged.

Need, Purpose and Goals of the ROMP

Shenandoah National Park prepared this ROMP to analyze alternatives for managing rock outcrop areas in the Park, and

“...address the need to protect, restore, and perpetuate rock outcrops and natural resources associated with the outcrops while providing a range of recreational opportunities for visitors to experience.”

Many rock outcrops in SHEN host globally rare flora, and the Park also seeks to address the

“...severe degradation of vegetation and soils at some rock outcrops, including impacts to rare species and communities, [that have] occurred due to intense use of rock outcrops by recreational activities.”

Accordingly, the SHEN ROMP was prepared to provide a decision framework for the following:

- Analysis of a reasonable range of alternatives to meet management objectives;
- Evaluation of potential issues and impacts to natural and cultural resources and values and the human environment; and
- Identification of mitigation measures to lessen the degree of those impacts.

As you know, National Park Service (NPS) policy recognizes that providing for visitor recreational use has been a fundamental purpose of NPS areas since the establishment of Yellowstone National Park in 1872. Current NPS Management Policies state that

² According to SHEN surveys, the Park has less than 500 climber use-days per year.

“...the National Park Service will encourage recreational activities that are consistent with applicable legislation [and] that promote visitor enjoyment of park resources through a direct association or relation to those resources.”

Accordingly, the Shenandoah ROMP should encourage and support recreation such as climbing in the Shenandoah backcountry because climbing provides a direct association and relation to the natural resources of Shenandoah National Park. Moreover, climbing in SHEN’s designated wilderness provides exemplary “opportunities for solitude, primitive and unconfined recreation” that the Wilderness Act sought to promote.

II. GENERAL COMMENTS

The Shenandoah National Park ROMP outlines four general alternatives:

1. Alternative A: No Action
2. Alternative B: Balance Between Natural Resource Protection And Visitor Use (NPS Preferred Alternative)
3. Alternative C: Emphasis On Natural Resource Protection
4. Alternative D: Emphasis On Visitor Use

Access Fund supports Alternative B—with the addition of suggestions provided herewith—because we feel that this alternative best balances resource protection with recreational opportunities in SHEN. While Preferred Alternative B proposes specific climbing area closures, restrictions and management actions that the Park would implement through proposed Climbing Management Guidelines (CMG), most rock outcrop management would rely on “light-handed management tactics” such as educational trailhead bulletin displays, internet and print information, informational and educational programs, and improvement of formal trails and reduced use of informal trails to concentrate recreation use and minimize site impacts.

The Access Fund supports the adaptive management provisions in Alternative B. For example, we applaud the use of various “watch sites” for close monitoring of climbing impacts (with potential further restrictions or prohibitions in the future) rather than immediate restrictions that may not prove necessary or even effective.³ Under Alternative B, rock climbing access would be maintained for the majority of climbs, but low barriers and signs would be installed on some access points and informal trail routes.

³ The rock outcrop “watch” sites would be targeted for at on-going annual inspection for damage to resources identified as climbing related. Climbing related impacts at SHEN may include vegetation damage or removal at cliff faces, trampling damage to vegetation at cliff top “staging areas” or climbing routes, rope impacts to tree bark and lichens resulting from use of trees as climbing anchors, placement of climbing hardware, and use of chalk.

While some new climbing restrictions and prohibitions may occur under Alternative B,⁴ overall impacts to climbing activities would be negligible and there would be several beneficial effects on the climbing environment. In sum, the Access Fund generally supports Alternative B with additional amendments to the CMGs noted the Specific Issues outlined below.

The Access Fund opposes the climbing site restrictions in Alternative C and believes that Alternative B provides necessary resource protections without the extreme restrictions proposed in Alternative C. Alternative C would have adverse, site specific, impacts to climbing from construction related activities and several unnecessary climbing restrictions or prohibitions.⁵ Although Alternative D would most positively benefit climbing access in the Park, under Alternative D extensive unmanaged recreation would be allowed and adverse, site specific impacts might occur and only lead to increased climbing restrictions and more damage to Park resources. Findings from SHEN's visitor survey suggests that climbers that regularly visit both Little Stony Man Cliffs and Old Rag Mountain generally support management actions—including limited climbing restrictions—designed to protect park resources. Alternative B best fits the goals of the ROMP and the preferences of climbers that frequently recreate at SHEN.

III. SPECIFIC ISSUES

The following specific Access Fund comments address issues that we feel the NPS should incorporate into the final Shenandoah National Park ROMP.

Trails and Informal Paths to Climbing Areas

At present there exists a network of user-built trails established by the climbing community to access the various climbing cliffs within Shenandoah National Park. The Access Fund applauds the work to inventory this network, establish baseline data, and analyze where trails need maintenance, upgrading, relocation or closure. Following such an analysis, these climber access trails may be formally incorporated into the Shenandoah National Park's trail plan so that maintenance work can be facilitated commensurate with the NPS's NEPA obligations, and in so doing streamline any necessary environmental compliance reviews.

The Access Fund supports the policy in preferred Alternative B which directs that rare natural resources be protected from visitor impacts by relocating the Appalachian Trail from the cliff top down to the current location of the Passamoquoddy trail on the lower

⁴ "...adverse, site specific, minor, short-term impacts from construction related activities and adverse, site-specific, negligible to minor, long-term impacts on climbing activities."

⁵ Under Alternative C several sites would be closed to climbing including Little Stony Man Cliffs, Hawksbill Summit, Old Rag Mountain Eastern and Western Summits, Skyline Wall, Reflector Oven, North Marshall Summit, Mary's Rock, South Marshall, Blackrock, South District, and Bearfence.

cliffs. Also, we support hardening the “chute” trail into rock stairs and the barriers and signs that would direct day hikers and campers away from informal climbing trails.

Climbing Management Guidelines

The Access Fund generally supports the well researched and conceived Climbing Management Guidelines (CMGs) that would be implemented in preferred Alternative B. The goals of the Climbing Management Guidelines are to:

1. Meet the National Park Service mandate to manage appropriate recreational use;
2. Protect natural and cultural resources from recreational use impacts;
3. Provide rock climbing and other climbing-related opportunities; and
4. Protect the backcountry and wilderness experiences of other park visitors.

In working to meet these objectives, the Access Fund believes that Shenandoah National Park should develop criteria that would guide and direct decisions on managing new climbing and bouldering routes. A first consideration for management action by the NPS should determine whether potential impacts to SHEN resources can be mitigated through climber education, and we support the provisions in the CMGs that outline a climber education strategy. The NPS should engage the local climbing community to gauge whether this plan will be effective and potential options for climber assistance

It is important that the NPS institute a presumption that new climbs and bouldering areas within Shenandoah National Park be considered an appropriate use of the Park. Unless there is a clear, imminent need to prohibit new routes based on objective environmental or social data, the presumption should remain that new climbing/bouldering routes are authorized unless prohibited for resource-based reasons.

The NPS at Shenandoah National Park may want to review established climbing management plans implemented by other NPS units. Two exemplary CMPs that address many of the same issues that concern the NPS at Shenandoah National Park are:

- The New River Gorge National River – Climbing Management Plan (2005)
<http://www.nps.gov/neri/cmp/>
- The Obed Wild and Scenic River – Climbing Management Plan (2002)
<http://www.nps.gov/obed/final-CMP.pdf>

However, neither the New River nor the Obed plans deal with climbing management within federally-designated wilderness areas. Two excellent National Park Service management plans (with specific climbing management provisions) that concern park lands that are “managed-as wilderness” include:

- Rocky Mountain National Park – Backcountry Management Plan (2001) - http://www.nps.gov/romo/parkmgmt/wilderness_backcountry_plan.htm)
- Zion National Park – Backcountry Management Plan (2007) - <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm>

Both the Rocky Mountain and Zion plans concern national parks with a large volume of climbing activity *and* a wilderness preservation mandate. Both these parks follow adaptive management regimes with regard to climbing and fixed anchor use. Neither park requires prior authorization for new fixed anchors, but they do outline fixed anchor limits that have been successfully followed by the climbing community. See below for further discussion regarding the management of fixed anchors in wilderness.

The Access Fund supports the proposed language in the CMGs discouraging the Use of Trees as Anchors (4.5.4), which notes that potential impacts to trees when used as anchors includes damage to bark and lichens from ropes moving around and across trees. We agree that LNT techniques can be used to properly use trees as anchors; however, in lieu of trees, fixed anchors are commonly used successfully in many places as a resource protection tool to limit impacts to cliff-top ecologies.⁶ We support limiting the use of trees as anchors whenever possible and instead using the strategic placement of fixed anchors just below the cliff edge reduce trampling in the forest zone and minimize damage to cliff-tops.

The Access Fund supports the Leave No Trace and “clean climbing” polices recommended in the ROMP/CMGs (4.5.1) as well as the proposed polices prohibiting gluing, chipping, and excessive gardening. While unlikely, we also support limits on “leaving fixed ropes for extended periods for the purpose of ascending and descending (rappelling) rock walls.”

Fixed Anchors

The Access Fund has a long history of working on fixed anchor policies with land management agencies. We are currently assisting all the major federal land agencies to develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas. 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. We maintain that

⁶ The draft ROMP notes that qualitative observation data suggest the high percentage of trampling by rock climbers in the forest observation zone is largely due to time spent constructing climbing anchors using trees.

any decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment.

Climbing anchors are necessary for climbers to experience the unique challenges found in SHEN. It is the Access Fund's position that fixed anchors are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for fixed anchors to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. Accordingly, the Access Fund believes that some level of fixed anchor use must be allowed in Shenandoah National Park wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations and the views of the local climbing community.

The draft ROMP notes that the majority of local SHEN climbers oppose a prohibition on the placement of bolts on climbing routes throughout the Park, but also oppose unregulated bolting in the Park. The ROMP also notes that the majority of local SHEN climbers support managing the use and placement of new bolts in the Park (including required permits to place new bolts), overall limits on new bolt placements at specified areas, and allowing the placement of fixed anchors at the top of climbs to minimize resource impacts. The Access Fund endorses the views of local SHEN climbers, especially for those SHEN climbing areas located outside designated wilderness.

Wilderness Fixed Anchors

Half of the rock outcrops studied in the ROMP and 40% of the land in SHEN are located in federally designated wilderness, and this brings another significant aspect to the ROMP CMGs as currently there exists no other prior-authorization process for allowing new fixed anchors in designated wilderness areas (NPS or otherwise). The proposed fixed anchor authorization process in the ROMP CMGs for such authorization may be workable and acceptable to all stakeholders (with a few revisions and clarifications), but because the NPS is entering new terrain with this management proposal, the Access Fund is concerned how this will play out at SHEN and how these new CMGs might be utilized at other NPS wilderness climbing areas (i.e., Yosemite, Black Canyon, Zion, etc.) who may use this ROMP proposal as a model plan. Many other national parks that manage wilderness climbing do not share the same elements (environmental conditions and local climbing traditions) that caused SHEN to plan for fixed anchor management as it has in the ROMP/CMG.

Through the draft CMGs, SHEN proposes to manage fixed anchors in wilderness as follows:

“4.5.3 Fixed anchors

Fixed anchors should be uncommon park-wide and rare in designated wilderness. The following policy applies to management of fixed anchors in the park:

- Superintendent’s Office or designee authorization is required for placement of new fixed anchors or fixed equipment (case by case review)
- Superintendent’s Office or designee authorization is required for the replacement of existing fixed anchors or fixed equipment (case by case review)
- Superintendent’s Office or designee authorization is required for removal of existing fixed anchors or fixed equipment (case by case review)

(Note: The park needs to complete an inventory of existing fixed anchors and equipment placements park-wide to manage a fixed anchor program; a partial inventory has been conducted by VA Tech. A process needs to be implemented to have climber requests for removals, replacements, or additional fixed anchors and equipment evaluated by experienced and highly skilled climbers for the Superintendent’s review and approval. The climber group would also monitor fixed anchor conditions park-wide to make recommendations to the Superintendent.)”

Several concerns emerge from these draft policies which have long been debated by the Interagency Wilderness Policy Council and were the subject of a USDA negotiated rulemaking that commenced in 1998.

- Does SHEN have the resources—staff, time, and funding—to effectively process new fixed anchor applications? Will an inability to process fixed anchor permit applications only result in a *de facto* ban?
- Can SHEN monitor the backcountry to adequately assess the location and character of new routes and the level of existing fixed anchors? How will it assess whether a new fixed anchor proposal is appropriate for a given location?
- Who will process new fixed anchor applications? Will climber consultants be part of this process?

SHEN should include members of the local and regional climbing community when populating a review committee for new fixed anchors so that the Park understands local traditions and gets “buy-in” from the community that this policy will affect most. Suggested individuals are noted in this document below.

The CMGs—at least with respect to managing fixed anchors in wilderness—are consistent with the guiding principles⁷ agreed to by the Interagency Wilderness Policy

⁷ Guiding Principles for Managing Fixed Anchors in Wilderness: 1) Motorized rock drills, chipping and glue and epoxy of hand and foot-holds are prohibited; 2) Climbers may use and remove temporary anchors without restriction, except in areas closed to climbing due to resource issues; 3) Climbers may use existing

Council in 2001. The Access Fund believes that these principles support the proposition that any authorization process for permitting the establishment of new fixed anchors in Wilderness should include a presumptive agency authorization for the placement of a *de minimus* number of fixed anchors necessary to:

- Enable a rappel when walking down after a climb is infeasible (obviously, less applicable at SHEN);
- When ascending a route to connect terrain that is otherwise protected by removable anchors; and
- To respond to an emergency.

The Access Fund believes this *de minimus* presumption is necessary to prevent *de facto* prohibitions of fixed anchors caused by field staff that may arbitrarily reject all applications to place new fixed anchors. This is particularly appropriate given the Interagency Policy Council's "agreement that rock climbing is an appropriate activity in wilderness, including the use and placement of fixed anchors." Thus, it should be the policy of the NPS at SHEN and elsewhere to allow a presumptive *de minimus* amount of fixed anchors absent a showing of compelling need to protect the resource. This concept is embraced by Natural Resources Management Guideline NPS-77 which states that:

"By definition, any recreational use will result in some level of impact. The backcountry planning process is not as much a process of determining how to prevent or mitigate any human-induced change as well as deciding how much change will be allowed to occur and whether there is an adverse impact or an impairment to one or more park resources or values whose protection is essential to the purposes for which the park area was established."

In addition, because the use and limited placement of fixed anchors is an appropriate activity in Wilderness, and because fixed anchors are safety devices, the ability of climbers to replace existing fixed anchors and place new fixed anchors should continue until any management process authorizing such placements is completed. Accordingly, moratoriums on fixed anchor placement pending the establishment of climbing management documents should be disfavored without a showing of actual, imminent need to restrict these necessary tools until a permitting process is in place and functioning.

Our concern is the time period between the issuance of the CMG provisions related to fixed anchors, and the establishment of a SHEN permitting process for authorizing fixed

permanent anchors without restriction, except in areas closed to climbing due to resource issues; 4) An authorization or permit is required to replace or remove an existing permanent anchor or place a new permanent anchor. A climbing management plan could identify where their use would be appropriate or inappropriate; and 5) The placement of an existing permanent anchor or placement of new permanent anchor is allowed to respond to an emergency. Interagency Wilderness Policy Council (2001).

anchors in wilderness. During this interim period the *status quo* on allowing new fixed anchors should remain, and thus SHEN's fixed anchors in wilderness policy should have language clearly stating that there are to be no moratoriums on fixed anchor use or placement during the time period between the issuance of the ROMP and the establishment of a process that may effectively authorize new fixed anchor placements.

Human Waste

Human waste can be a significant issue at areas that are popular climbing locations. While the ROMP/CMGs do not provide a lot of guidance on human waste issues, SHEN should consider signage educating climbers and other visitors regarding Leave No Trace principles posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund has found that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and suggest alternative conduct that can ameliorate the problem. The NPS should document the extent of this impact prior to or during the implementation of the ROMP so that any proposed management solutions will be based on objective baseline information rather than assumption that human waste has become a "problem."

Education/Community Outreach

A climber education program is a critical component to any effective climbing management initiative. Nearly all climbers will be sensitive to their impacts if they know the appropriate behavior. For example, as noted, signage educating climbers regarding Leave No Trace principles and area closures should be posted at parking lots and trailheads. The Access Fund applauds the proactive management approach proposed for education in the draft ROMP, to wit:

"Education of the visiting public and park staff is key to protecting rock outcrop resources. The ROMP seeks to implement a vigorous education program, including on-site programs, printed and electronic literature including a climbing brochure, climbing information at the park's website, and trailhead bulletin displays and signs that discuss the unique geological and rare biological components of the Park's outcrops, why their conservation is important, and how visitors can participate in conservation actions."

To be successful the NPS at SHEN should work with the local climbing community directly to foster understanding, appreciation, respect, and a sense of ownership for the natural and cultural resources of Shenandoah National Park. In addition to promoting a Leave No Trace ethic at Shenandoah, the NPS should continue to do all it can to incorporate the climbing community into any management decisions—such as raptor closures—that may affect public use of the area. By soliciting input from the climbing community directly on any proposed management initiative, the NPS will secure a key

partner that can provide insight into specific resource issues and conditions, labor for building trails or other infrastructure, support for regulation compliance, and a good relationship with one of its largest user groups. 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.

We recommend that all issues pertaining to climbing at SHEN, including climbing use patterns, climber traditions and history, or information about technical climbing tools and ethics, be dealt with through a climbing advisory/working group. Such a group will facilitate gathering, sharing and processing information on specific issues. This approach may also be desirable for the consideration of educational outreach and human waste issues. The following interested parties may be helpful regarding any climbing management planning for the Shenandoah National Park:

Ocean Eiler - oceaneiler@gmail.com

Thomson Ling - thomsonling@gmail.com

Matt Smith - msmithadv@yahoo.com

Matthew Wikswow - wikswow@cstone.net

Chris Irwin - cadaverchris@gmail.com

Simon Carr - sacarr@yahoo.com

Potomac Appalachian Trail Club (PATC), Mountaineering Section –
info@potomacmountainclub.org

Shenandoah National Park Climbers Alliance - snpclimbersalliance@gmail.com

Sunset Date

The Shenandoah National Park ROMP should indicate the duration of the proposed management initiative. Typically such plans have reauthorization dates of five years following plan approval to allow for any necessary revisions. Accordingly, the NPS should provide a time-period specifying the effective duration for this proposed Shenandoah National Park ROMP.

* * *

I hope the above information helps the NPS select and revise the appropriate alternative for the Shenandoah National Park ROMP, and clarifies ways in which the Access Fund

and local SHEN climbing community can be of assistance. The Access Fund supports the selection of the Preferred Alternative B with the changes and suggestions outlined in this comment letter.

The Access Fund looks forward to working with the NPS and any interested parties throughout the planning process for the Shenandoah National Park ROMP. Shenandoah National Park is truly a national treasure, both as a climbing resource 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 SHEN. We also appreciate your consideration that some of the ROMP management proposals—especially the CMG wilderness fixed anchor policies—could have implications for NPS-managed wilderness elsewhere where far different environmental and social conditions are found than at SHEN.

We hope our comments will provide a meaningful contribution to both the substance and clarity of the Shenandoah ROMP regarding planning goals, objectives, strategies, and the preservation of recreational opportunities. Please do not hesitate to contact me (jason@accessfund.org; 303-545-6772 x102) if you require more information, or would like to discuss any of the points covered in this comment letter.

Best Regards,



Jason Keith
Policy Director
The Access Fund

Cc: Gary Oye, National Park Service – Department of the Interior Chief of
Wilderness Stewardship & Recreation Management
Steve Bair – Backcountry and Wilderness Manager, Shenandoah National Park
Thomson Ling – Mid-Atlantic Climbers
Ocean Eiler – Mid-Atlantic Climbers
Simon Carr – Friends of Great Falls Coalition, American Alpine Club
Shenandoah National Park Climbers Alliance
Potomac Appalachian Trail Club (PATC), Mountaineering Section
Brady Robinson – Executive Director, The Access Fund
Jeffrey Marion – Unit Leader/Adjunct Professor, Department of Forestry,
Virginia Polytechnic Institute and State University