

June 18, 2003

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**Re: The Access Fund Comments on Environmental Assessment and Draft
Climbing Management Plan for New River Gorge National River**

Dear Gary:

The Access Fund welcomes the opportunity to comment on the Environmental Assessment and Draft Climbing Management Plan (Draft CMP) for New River Gorge National River (New River Gorge). We look forward to working with the National Park Service (NPS) to preserve climbing opportunities and conserve the climbing environment at the New River Gorge.

The Access Fund

As you know, 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 climbers organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers and mountaineers nationwide. The Access Fund's mission is to keep climbing areas open and 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 projects and scientific research relevant to the climbing environment.

A significant number of the Access Fund's members climb at New River Gorge. The Access Fund has a proud record of conservation activism at "The New," primarily through Gene Kistler who serves on the Access Fund's Board of Directors and helps lead the local New River Alliance of Climbers (NRAC). Prominent stewardship efforts conducted by the climbing community include the Volunteer Trail Projects whereby the Access Fund, NRAC, and NPS staff at New River Gorge worked together over a the period of a few years to help design and improve the many miles of climbing approach trails within the New River Gorge.

The Access Fund applauds the NPS for its ongoing effort to solicit public feedback to the Draft Climbing Plan for New River Gorge. We look forward to working closely with the NPS to formulate management policies for this unique and popular climbing area. The New River Gorge has relatively undisturbed natural environment, scenic qualities, excellent rock and variety of climbing opportunities that make it one of the finest climbing areas in the nation. The singular climbing experience found at the New River Gorge is part of the fundamental character of the river corridor, and management planning should provide for the preservation of this experience to the greatest extent possible consistent with resource protection objectives.

As you are undoubtedly aware, the New River Gorge contains some of the most unique, popular, and challenging technical climbing opportunities in the Eastern United States, if not the entire country. The Access Fund is concerned with the preservation of these opportunities, and we have reviewed the Draft CMP to assess the probable effect of the proposed management direction on climbing and the climbing environment. The Access Fund offers herewith observations and comments to the Draft Climbing Management Plan.

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The Access Fund supports the selection of preferred Alternative B as the best approach for managing climbing at the New River Gorge. Alternative B would allow for the most recreational opportunities, while at the same time providing for significant natural resource protection thus ensuring the ecological, cultural and social resource integrity of the New River Gorge. The Access Fund opposes the selection of Alternative C because of its preemptive peregrine closure that lacks both a legal and resource-based justification.

Education, Outreach, and Partnering

A climber education program is a critical component to any effective climbing management plan. Nearly all climbers will choose to “do the right thing” if they know the appropriate behavior. For example, signage educating climbers regarding Leave No Trace principles (www.lnt.org) should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund applauds the approach taken by the NPS New River Gorge staff, but for this CMP to be successful the NPS must do more than simply enforcing regulations or filing reports. Rather, the NPS should work with the climbing community to foster understanding, appreciation, respect, and a sense of ownership for the natural and cultural resources of the New River Gorge National River.

In addition to promoting a Leave No Trace ethic at the NRG, the NPS should continue to do all it can to incorporate the climbing community into any management initiatives—such as bird closures—that may affect public use of the area. This point goes to the *Outreach* objective noted in the Draft CMP: by soliciting input from the climbing community 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 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 also applaud the NPS’s strategy to provide information and educational materials to climbers before they arrive as well as using a variety of onsite educational opportunities such as signage and displays in the visitor centers. We urge the NPS to utilize the Access Fund and the New River Alliance of Climbers for both of these objectives. Appendix B—Ethics and Education—may serve as an excellent guide for onsite climber education concerning the appropriate standard for environmental care. However, Appendix B may also benefit from an informational section concerning peregrines that may educate climbers regarding peregrine behavior, likely nesting areas, and what to do and who to call if a bird and/or nest is observed. Indeed, climbers may be the NPS’s best asset for monitoring the area for nesting peregrine falcons.

Trails and Ladders to Climbing Areas

With the help of local activists, an effective network of trails have been built that lead to and from popular climbing areas and along the top and bottom of the cliffs throughout the New River Gorge. Ladders have been constructed at several locations that allow climbers quick access to climbing areas without the need to rappel and the attendant staging impacts that could also affect cliff-top ecologies.

The Access Fund encourages the NPS 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 should be formally incorporated into the New River Gorge’s trail plan so that maintenance work can be facilitated commensurate with

the NPS's NEPA obligations, but streamlining any necessary environmental compliance reviews. That is, once these trails are incorporated into the formal NRG trail plan, time consuming and expensive environmental reviews will not prevent even the most basic maintenance on existing trails.

Resource Monitoring

According to the Draft CMP, as climbing has increased in popularity, the natural and cultural resources in the New River Gorge have been affected, including plant and animal species of concern. However, there has not been an overall program in place to monitor and document how these resources have been affected by increased climbing use.

The Access Fund believes that baseline studies that inventory and map existing climbing and bouldering routes are crucial to effectively manage climbing and protect natural and cultural resources at the New River Gorge. The Access Fund's Conservation Grants Program has provided hundreds of thousands of dollars over the past twelve years for environmental restoration, trail building and maintenance, support for wildlife programs, climber education, and facilities such as parking area improvements, waste disposal units, and trailhead signage. Our Conservation Grants Program funds projects that preserve or enhance climbing opportunities and conserve the climbing environment throughout the United States. Please consult our website (www.accessfund.org) to review project funding criteria and the process for applying for grants which we award three times annually. We encourage the NPS to look to the Access Fund as a resource to help with developing, implementing and funding climbing management actions at the New River Gorge, including crucial baseline studies identifying current climbing conditions and practices.

As noted in the Draft CMP, the Access Fund supports, the collection of data on climber numbers, routes, access points, and times when climbing is taking place so that the NPS may "make better decisions in the future" regarding climbing management. The Final CMP should outline a basic plan as to how this project may be completed.

Chalk

The Draft CMP asserts that the magnesium carbonate chalk used by climbers can leave a stain on the rock, which some may view as an objectionable visual impact. In addition, there is concern that chalk alkalinity might affect the chemical balance of the rock and surrounding soils, resulting in adverse impacts on plants and animals. Again, before any decisions need to be made about whether chalk use should continue to be unrestricted, whether the NRG should designate chalk-free zones, and whether chalk use is affecting the flora and fauna, the NPS should establish baseline studies that will help the NPS determine any on-going impacts caused by chalk. The Access Fund encourages and supports less restrictive management practices such as establishing "chalk-free zones" rather than implementing outright closures in areas where chalk is causing demonstrated chemical or visual resource impacts.

Peregrine Falcons

Peregrine falcons are currently not nesting at the New River Gorge. Despite hosting potential peregrine habitat, it's not clear whether climbing activities have prevented peregrine falcons from nesting or whether peregrines have decided not to use the area for other reasons. While the area known as the Endless Wall has potential as a nesting site for peregrine falcons in the New River Gorge, the same could be said for the hundreds of cliffs within a few hours drive of the New River Gorge. The Access Fund's concerns with a cliff closure to accommodate speculative peregrine nesting are well documented.^{1[1]}

The Draft CMP notes that although falcons have been observed along the Endless Wall since the hacking program in the early 1990s, "there is no evidence that any falcons have established nests in the area." The Access Fund agrees that recreational activities, including rock climbing, have the potential to disrupt cliff bird communities. Furthermore, the preservation of climbing opportunities that include the viewing of outstanding wildlife resources such as peregrine falcons is an ongoing objective of the Access Fund. However we cannot support a mandatory closure, such as provided in Alternative C, that would close miles of cliffs to support what we view as an unreasonable speculative nesting program.

Appendix G—Peregrine Falcon Monitoring Protocol (PFMP)—outlines a program that seeks to determine whether peregrine falcons are breeding or attempting to breed on or near the Endless Wall from Beauty Mountain to the bridge area in the New River Gorge. The objective of the PFMP is to establish with reasonable certainty whether peregrine falcons are or are not breeding in the area, and, if so, implement a climbing closure in the area near the observed nesting site.

In general, the Access Fund supports the PFMP as outlined in Appendix G. In particular, we support flexible closures that can adjust the scope of any such closure—in terms of both time and area—dependent on exactly where any nests are discovered and when breeding and fledging is complete. While the protocol identifies procedures for scenarios when birds are observed, the CMP should also provide a date when—if no birds are observed—the PFMP will be considered complete and the monitoring program no longer necessary. Following a determination that no falcons have bred or nested within the NRG, the less intensive (and cheaper) Cliffwatch program could be reestablished to maintain some formal monitoring of the area for cliff-nesting raptors.

Cultural Resources

The Draft CMP notes the rich record of human presence represented throughout the NRG area, including the numerous prehistoric archeological sites. While the NPS states that

^{1[1]} Please reference the letter from Jason Keith, Policy Director, The Access Fund, to Calvin Hite, Superintendent, New River Gorge National River (April 30, 2002), and letter from Jason Keith, Policy Director, The Access Fund, to Greg Jarvis, Natural Resource Specialist, National Park Service (August 16, 2002).

climbing activities on the sandstone cliff faces could “directly and indirectly” affect cultural resources at the New River Gorge, there is as yet no data provided in the Draft CMP noting any such direct or indirect conflicts.

The Access Fund has a long record of supporting resource-based closures such as those protecting cultural sites. An example of this work is the Access Fund Conservation Grant we awarded to analyze cultural sites in the Daniel Boone National Forest at the Red River Gorge. In our experience, impacts from climbing on cultural resources can be mitigated through a number of means short of outright permanent closures. Again, the Access Fund encourages the NPS at the New River Gorge to consult with us if such conflicts arise so that we may effectively help to minimize both the recreational impacts of climbing on cultural resources, and assist in defining the appropriate the scope of any closure.

The Access Fund supports the continued inventory and evaluation of cultural resources at the New River Gorge, the establishment of educational materials informing visitors to the NRG of the cultural resources there, and the development of cultural resource stewardship strategies and implementation of mitigation plans for known threats to cultural resources. Because there appear to be no conflicts between climbing and cultural resources at the NRG at this time, the management strategies noted above may be better articulated in a non-climbing planning document (such as a general management plan). Nonetheless, if the NPS does address cultural resource management in the CMP, the Final CMP should further clarify and outline a plan for how the NPS would implement these educational, stewardship and mitigation strategies.

Group Use

Large group use can sometimes impact the experience of the general public when recreating on public lands. Group use can dominate the relatively few—and already overcrowded—“beginner” climbs. Further, large group use often impacts cliff-top ecologies and tramples staging areas at the base of the cliffs more than would individual parties. The Draft CMP notes that, for example, the Bridge Buttress climbing area is now heavily eroded at the top and bottom of the cliff band. Large groups may also cause safety concerns, with respect to the competency of guides and just the simple fact that large groups are more likely to accidentally cause rock fall, potentially endangering those at the bottom of the cliff area. One way to control these potential adverse effects from large group use is to designate group areas and establish a ratio of guides to clients, or group leaders to students.

The Access Fund supports the designation in Alternative B of group areas (at the Bridge Buttress and other appropriate sites) for commercial and private interests. For non-group areas the Access Fund also supports the guide to client ratio in Alternative B (1 guide for every 2 clients, with the guided group no larger than 6 total including guides). We agree that this management regime for group use will help to reduce resource impacts and make it possible for individual groups—that is, the rest of the general climbing public—to have a quieter, high-quality experience while also improving climber safety.

Fixed Anchors

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. The NPS must protect the resource, but is required only to consider (not necessarily satisfy) the philosophical priorities of climbers or any other interest group. We maintain that any decisions regarding bolting should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment.

The Draft CMP notes that the use of power drills has assisted in the relatively quick and easy placement of approximately 500 sport routes and 200 mixed routes at the New River Gorge, and because of concern about possible resource impacts from the sudden increase of new routes, the NPS implemented a ban on the use of power drills in 1995. The use of hand-drills is still available to place fixed anchors. The Draft CMP also notes that “the ban on power drills has proven highly effective in controlling the proliferation of fixed anchors on NPS property.” It would be helpful if the NPS had data showing the percentage decrease in fixed anchor placement caused simply by this power drill prohibition as such could be valuable information for managing fixed anchors elsewhere. At present there is no procedure for anchor replacement (using power drills) other than a generalized proposal that requires the approval of the supervisor.

The Access Fund supports the language in Alternative B that would allow the limited use of power drills for replacing existing fixed anchors that need repair. Power drills often place better formed, and thus longer lasting, holes into which the bolt is installed. Sometimes hand-drilling causes an unnecessarily wide hole—because of the back and forth action of the hand—and therefore the hole will not as securely accommodate the bolt.

Alternative B in the draft CMP would allow for such power drill use, “after being approved by the superintendent.” The NPS should clarify how such “approval” would be obtained. The NPS may want to consider a permit system whereby climbers can replace existing bolts with a power drill. This could be done only on specific days and thus limit any social impacts on other users.^{2[2]} If desired, the Access Fund can provide the NPS with several examples that other public land units use for permit applications to install fixed anchors.

Environmental Consequences

The Access Fund works with resource managers around the country on a variety of public land units to help protect natural resources in areas visited by climbers. In so doing, we have helped to develop successful protocols to protect nesting raptors, for example, and

^{2[2]} Power drills also take a fraction of the time that a hand drill would take to establish an appropriate bolt hole, and so power drills may arguably decrease the audio impacts on other users.

are helping resource managers in many areas to monitor wildlife activity. We would be pleased to work more closely with the NPS to identify and mitigate the environmental impacts associated with climbing at the NRG.

It is the Access Fund's experience that virtually all potential threats or actual impacts to natural and heritage resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions such as seasonal restrictions or (in extreme cases) spatially limited closures. We are familiar with a wide range of resource concerns and appropriate mitigation responses, including erosion, loss of vegetation at staging areas, possible effects on nesting birds and rare species, effects on cliff-top (rim) ecologies, possible conflicts with cultural values, and human waste disposal.

One particular form of assistance the Access Fund is pleased to provide is cooperation with wildlife management programs, in particular protection of federally—or state—listed species of raptors, bats, and flora which may inhabit the cliffs of interest to climbers. We are working with resource managers at more than fifty areas around the country to educate climbers about peregrine falcon nesting and seasonal restrictions, which are sometimes imposed to promote peregrine nesting. Please review our website (www.accessfund.org) for a list of all areas currently subject to seasonal restrictions to facilitate raptor nesting. In addition, we have published a handbook for management of climbing in raptor nesting habitat, which is available by contacting Jason Keith at jason@accessfund.org or (303) 545-6772 x102.

CONCLUSION

As stated, the Access Fund supports the selection of Alternative B as the preferred management approach because it allows for recreational opportunities at the New River Gorge while at the same time provides necessary resource protection. Alternative B would involve the use of a variety of approaches and tools to manage climbing, including education and outreach efforts, limiting adverse impacts caused by group use, protecting natural and cultural resources, and implementing a reasonable program to monitor potential cliff-nesting raptors. In short, Alternative B would provide an appropriate balance between recreational use and resource protection.

The New River Gorge is truly a national treasure, both as a recreational 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 New River Gorge. The Access Fund commends the NPS for developing a reasonably balanced management direction, which has been inclusive of public preferences and values.

We hope our comments will provide a meaningful contribution to both the substance and clarity of the Final Climbing Plan regarding planning goals, objectives, and strategies.

Best Regards,

Jason Keith
Policy Director
The Access Fund

Cc: Steve Matous, Executive Director, The Access Fund
Gene Kistler, New River Alliance of Climbers
Jim Zoia, Democratic staff director of the House Committee on Resources,
US House of Representatives
John Bliss, esq., The Law Offices of John S. Bliss