

VIA EMAIL

New York State Department of Environmental Conservation
Kristofer A. Alberga, Senior Forester
625 Broadway
Albany, NY 12233
R5ump@gw.dec.state.ny.us

April 9, 2003

Re: The Access Fund Comments on Dix and Giant Mountain Wilderness Area Unit Management Plans (UMPs)

Dear Mr. Alberga:

The Access Fund welcomes the opportunity to comment on the Dix and Giant Mountain Wilderness Area Unit Management Plans (UMPs). We look forward to working with the Department of Environmental Conservation to preserve climbing opportunities and conserve the climbing environment in the Adirondacks.

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 largest national climbers organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers 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. More information about the Access Fund can be found at www.accessfund.org.

A significant number of the Access Fund's members climb in the Adirondacks. The Access Fund has a proud record of conservation activism in the northeast in general, and in the Adirondacks in particular. Most prominently was an Access Fund Adopt-A-Crag event at two major crags in Adirondack Park (the "Park") that received our annual award for the year 2001. Adopt-a-Crag is aimed at educating the climbing community about the importance of stewardship and volunteerism. The Adirondack events succeeded through the cooperation of Park staff and the hard work of volunteers along with community support from the Mountaineer, Adirondack Rock and River, and Lake Placid EMS retailers. Five crews worked on 1000+ feet of trail, built rock steps, and addressed erosion problems.

As you are probably aware, the Adirondack region contains some of the most unique, popular, and challenging technical climbing opportunities in the Northeast. The Access Fund is concerned with the preservation of these opportunities, and we have reviewed the Draft UMPs to assess the probable effect on climbing and the climbing environment. The Access Fund offers herewith some observations and suggested improvements to the Unit Management Plans.

GENERAL REMARKS

The Access Fund applauds the Department of Environmental Conservation (DEC) for its ongoing effort to solicit public feedback to the Draft UMPs for Dix and Giant Mountain Wilderness Areas. We look forward to working closely with the DEC on this endeavor. The Adirondacks are a unique and popular climbing area. The Park has a relatively undisturbed natural environment, scenic qualities, excellent rock, and variety of climbing opportunities. The singular climbing experience found in the Dix and Giant Mountain Wilderness Areas is part of the fundamental character of the Park, and management planning should provide for the preservation of this experience to the greatest extent possible consistent with resource protection objectives.

Management of Fixed Anchors

The Access Fund notes that bolts, permanent pitons and other fixed anchors are prohibited as non-conforming uses under the Adirondack Park State Land Master Plan (APSLMP), and implied in DEC regulations. Fixed anchors, especially bolts, are sometimes controversial. In our experience concerns about fixed anchors 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 DEC 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 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. 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. The Access Fund believes that some level of fixed anchor use must be allowed wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis.

The Access Fund has a long history of working on fixed anchor policies with land management agencies. Indeed, we helped all the major federal land agencies develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas. The Interagency Wilderness Policy Council has generally accepted the following management outline which will be incorporated into policy guidance and regulations by the Bureau of Land Management, U.S. Forest Service, and National Park Service.

General Principles for the Management of Fixed Anchors in Wilderness

1. Wilderness is a unique resource that affects recreation uses including climbing.
2. Climbing is a legitimate and appropriate use of wilderness.

3. Anchors are used to improve climbing safety.
4. Management should include:
 - Authorizing the placement of new permanent anchors.
 - Authorizing the replacement of existing permanent anchors.
 - Authorizing the removal of existing permanent anchors.
5. Depending on the significance of the issue, the responsible agency can, with public participation, develop local plans (i.e., Climbing Management Plans) to address issues related to climbing.
6. Following the establishment of a Climbing Management Plan, agencies may provide authorization for the placement of new permanent anchors or the removal or replacement of existing permanent anchors. Such CMPs should consider resource issues (including the wilderness resource), recreation opportunities and emergency situations.
7. Permanent fixed anchors should be rare in wilderness.

Specific Provisions for Managing Fixed Anchors in Wilderness

1. Motorized rock drills are prohibited in designated wilderness.
2. Climbers may use and remove temporary anchors without restriction.
3. Climbers may use existing fixed anchors without restriction.
4. Agency authorization may be required following the establishment of a Climbing Management Plan to replace or remove an existing fixed anchor or to place a new fixed anchor.
5. The replacement of an existing fixed anchor or placement of a new fixed anchor is allowed, without restriction, to respond to an emergency.

Essential Principles and Specific Guidance Provisions

The Access Fund also views the following points as essential elements in any wilderness policy governing fixed anchors:

1. Voluntary reporting and monitoring of fixed anchor placements by climbers.
2. 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;
 - When ascending a route to connect terrain that is otherwise protected by removable anchors; or
 - To respond to an emergency.
3. Because fixed anchors are safety devices, the ability of climbers to replace existing fixed anchors or place new fixed anchors should continue until any management process 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.
4. Interim Management Policies for proposed wilderness should be no more restrictive than the management of fixed anchors in designated wilderness.

ENVIRONMENTAL CONSEQUENCES

The Access Fund is working with resource managers around the country, on a variety of public lands, to help protect natural resources in areas visited by climbers. We would be pleased to work more closely with the DEC to identify and mitigate the environmental impacts associated with climbing at Adirondack Park.

It is the Access Fund's experience that virtually all potential threats or actual impacts to natural resources associated with climbing can be 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.

Impact to Soils/Impact to Vegetation/Impacts to Threatened, Endangered, and Sensitive Species

The Access Fund has worked extensively with resource managers around the country to address these specific concerns and would be pleased to work more closely with DEC on wildlife management in the climbing environment. We have helped to develop successful protocols in other public lands to protect nesting raptors and are helping resource managers in many areas to monitor wildlife activity.

The Adirondacks are truly a national treasure, both as a climbing and recreational resource, as well as a unique natural area. On behalf of the American climbing community, the Access Fund thanks the Department of Environmental Conservation for soliciting public input, and for its commitment to preserving the exceptional climbing opportunities found in the Dix and Giant Mountain Wilderness Areas. The Access Fund commends DEC for developing a reasonably balanced management direction, which has been inclusive of public preferences and values. We hope our comments will contribute to more objectivity in decision-making and more clarity in the UMPs regarding planning goals, objectives, and strategies.

Sincerely,

Shawn Tierney
Access and Acquisitions Director
The Access Fund

Cc: Dave Rosenstein, Access Fund President
Steve Matous, Access Fund Executive Director
Jason Keith, Access Fund Policy Director
Heather Hibbard, Access Fund Regional Coordinator
Ed Palen, Adirondack Rock and River, Inc.

