



Protect America's Climbing

January 9, 2013

Shenandoah National Park
3655 U.S. Highway 211 East
Luray, VA 22835-9036

RE: Access Fund Comments on the Rock Outcrop Management Plan Environmental Assessment/Assessment of Effect 2012 for Shenandoah National Park

Dear Planning Team,

The Access Fund, Mid Atlantic Climbers (MAC),¹ and New River Alliance of Climbers (NRAC)² welcome this opportunity to comment on the *Rock Outcrop Management Plan Environmental Assessment/Assessment of Effect 2012* (ROMP) for Shenandoah National Park (SHEN).³ Subject to a few specific concerns listed below, we generally support the management approach outlined in Alternative B (NPS preferred alternative) and the associated Climbing Management Guidelines within the ROMP. The Access Fund, MAC, and NRAC are committed to assisting SHEN by providing climbing management expertise, local knowledge, resources, and community outreach.

Access Fund

Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.⁴ Many of our members regularly climb at Shenandoah National Park. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

The Access Fund submitted comments, incorporated herein by reference, in 2008⁵ regarding the previous version of this ROMP and were very surprised when SHEN released the 2012 ROMP without any communication or prior notification despite the Park's 1998 Backcountry and Wilderness Management Plan specifically directing our involvement in future climbing management guidelines. However, we appreciate SHEN's willingness to extend the comment

deadline which allowed us and the local climbing community a better opportunity to fully review the latest ROMP. Moving forward we encourage SHEN to engage the local climbing community and organizations like ours in advance of releasing or implementing any ROMP.

Rock outcrops compose only 2% (3,920 acres) of the SHEN's entire 197,438 acres.⁶ Further, two rock outcrops specifically, Old Rag and Little Stony Man, are by far the most popular areas used by climbers. Old Rag requires a long approach and climbers must be able to lead routes using traditional protection. Little Stony Man is much closer to the road and draws beginner climbers because the nature of the area allows top-roping. It must be noted that other activities such as hiking, camping, and vista enjoyment draw far more people and cause far more impacts than climbers. As stated in the ROMP, Old Rag is visited by an estimated 50,000 people annually,⁷ but the number of climber use-days for all of SHEN is estimated at only 500.⁸

The ROMP provides general information about the impacts causing concern, but more information about the specific concerns at any particular rock outcrop that has restrictions or for which restriction are being considered should be provided. Hawksbill is an example where climbing is prohibited but the concerns leading to the decision are not fully explained. More detailed information will allow for better understanding of the need for restrictions and may allow for a less restrictive management approach. Because climbers make up only a small percentage of rock outcrops users, decisions to restrict access to specific rock outcrops (especially those on the "watch list") should consider if some climbing access can be allowed even if other user groups are restricted or otherwise more directly managed. Park planners should consider ways to protect the natural resources without prohibiting access to climbers completely.

Access Fund Assistance

Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*⁹ and website www.climbingmanagement.org, have both proven to be a useful tool for land managers across the country. The climbing community and the Access Fund stand ready to help planners identify and improve the climbing related trail system and other management considerations. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program¹⁰ or assistance from our Conservation Team¹¹ which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of climbing management for SHEN. The Access Fund, Mid Atlantic Climbers, and New River Alliance of Climbers support the Park's preferred Alternative B and we look forward to participating throughout the entire planning process and assisting SHEN implement reasonable management policies. Please keep us informed as this process

proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,



s/ Edwin Bachetti

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Policy Director
Access Fund

Edwin Bachetti
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s/ Kenny Parker

Vice President
New River Alliance of Climbers

Cc: Brady Robinson, Access Fund, Executive Director
Edwin Bachetti, Access Fund Regional Coordinator & Mid Atlantic Climbers
Matthew Wikswo, Shenandoah National Park Climbers Alliance
Gene Kistler, Access Fund Regional Coordinator & New River Alliance of Climbers
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Leigh Goldberg, American Alpine Club, Conservation & Advocacy Director
Potomac Appalachian Trail Club (PATC), Mountaineering Section

¹ <http://midatlanticclimbers.org/>

² <http://www.newriverclimbing.net/about-us>

³ <http://parkplanning.nps.gov/document.cfm?parkID=274&projectID=19298&documentID=50505>

⁴ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

⁵ http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/VA_Shenandoah_4_12.19.2008.pdf

⁶ Shenandoah National Park, Rock Outcrop Management Plan Environmental Assessment/Assessment of Effect, Chapter 1: Purpose and Need for Action pg. 3.

⁷ *Id.*

⁸ Shenandoah National Park, Rock Outcrop Management Plan Environmental Assessment/Assessment of Effect, Chapter 3: Affected Environment pg. 65.

⁹ <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>.

¹⁰ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

¹¹ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.