

VIA EMAIL

Audrey Calhoun, Superintendent
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

December 14, 2005

Re: The Access Fund Comments on Draft General Management Plan and Environmental Impact Statement for Great Falls Park

Dear Superintendent Calhoun:

The Access Fund welcomes the opportunity to comment on the Draft General Management Plan and Environmental Impact Statement (Draft GMP/EIS) for Great Falls Park. We look forward to working with the Park Service to preserve climbing opportunities and conserve the climbing environment at Great Falls Park.

The Access Fund

The Access Fund is a 501(c) 3 non-profit climbing 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.

GENERAL REMARKS

The Access Fund applauds the NPS for its ongoing effort to solicit public feedback to the Draft GMP for Great Falls Park and we look forward to working closely with the NPS on this endeavor. Great Falls Park contains some of the most unique, popular, and challenging technical climbing opportunities in the Washington D.C. area. Management planning should provide for the preservation of this experience to the greatest extent possible consistent with resource protection

objectives. The Access Fund is concerned with the preservation of these opportunities, and we have reviewed the Draft GMP to assess the new management direction's probable effect on climbing and the climbing environment only.

The Access Fund is primarily concerned that the Draft GMP does not offer a complete range of sufficiently detailed alternatives. Because Alternatives A and B (the Park's preferred alternative) negatively affect climbing opportunities the Access Fund recommends that additional alternative be explored.

Specifically, the Draft GMP is inadequate in the following:

- **Unreasonably narrow range of alternatives** - As noted, the alternatives presented in the Draft GMP do not represent a reasonable range of alternatives. Because the No Action alternative is required, the Park has essentially prepared one alternative. The Access Fund believes this is insufficient.
- **Each alternative negatively affects climbing** - Specifically, both of the alternatives negatively affect climbing access because they reduce or restrict climbing opportunities without providing sufficient evidence or adequate justification as to why this is necessary.

ALTERNATIVE B (Preferred Alternative)

The preferred alternative would have the park preparing a Climbing Management Plan (CMP) that would designate climbing sites. The CMP would also explore the option of reducing climbing sites in areas where there is potential for damage to sensitive natural and cultural resources. The park would also designate routes with anchors and control access to the climbing sites through the issuance of permits.

Because the Draft GMP lacks information regarding either the current or desired future climbing conditions the Access Fund questions the need for a CMP at this time. Any decision of whether or not to prepare a CMP should proceed from an objective basis, that is, a description on the present condition of climbing opportunities and routes, an assessment of climber preferences and expectations, an assessment of the relationship between climbing activities and recorded resource impacts, and the articulation of desired future conditions.

To determine whether a CMP is necessary, Great Falls Park would benefit tremendously by soliciting input from the local climbing community. The Friends of Great Falls (FOGF) has formed specifically for the purpose of assisting the park in this regard. FOGF is a coalition of climbers from DC, VA, and MD who climb at Great Falls Park. The Access Fund recommends that if a CMP is developed, the park work with a climbing advisory group comprised of FOGF members. The Access Fund has also prepared a useful resource for land managers entitled: Climbing Management: A Guide to Climbing Issues and the Production of a Climbing Management Plan which can be found at: <http://accessfund.org/pubs/index.php>

Closure of Climbing Sites

We note that the preferred alternative would explore the option of reducing climbing sites in areas where there is potential for damage to sensitive natural and cultural resources. The Access Fund is concerned that under both alternatives of the Draft GMP, the climbing areas known as Gorky Park, Microdome, and Flat Iron would be closed to climbing. The Access Fund is opposed to these closures, and we suggest exploring mitigation options that preserve access to these areas while protecting sensitive resources. Until such measures have been explored, the Access Fund can not support the closure of these areas.

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 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.

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 Park Service to identify and mitigate the environmental impacts associated with climbing at Great Falls.

Climbing Permits

The preferred alternative suggests that permits may be used to control climbing access. The Access Fund is opposed to a permit system, viewing it as overly bureaucratic and unnecessary. The Draft GMP fails to provide any information as to why a permit system is necessary from the park's perspective, or how such a system would be implemented.

Climbing Anchors

The preferred alternative suggests that the park would designate routes with anchors. Fixed anchors (bolts) are sometimes controversial. Fixed anchors may have effects on natural resource values, scenic and aesthetic values, and visitor use patterns. Prior to any management response, an analysis should be made to determine the actual need for and role of fixed anchors. As previously noted, the Access Fund recommends that the NPS work with representatives from FOGF to determine whether fixed anchors are warranted. Should fixed anchors be placed, routes should not be limited to those locations only.

ENVIRONMENTAL CONSEQUENCES

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 Great Falls Park on resource management in the climbing environment. We have helped to develop successful protocols

in other public lands to protect soils, vegetation, nesting raptors and are helping resource managers in many areas to monitor wildlife activity.

Social Trails

The Access Fund supports a Trail Management Plan (TMP) that would inventory all formal and social trails, their conditions, needed improvements, and whether to maintain or eliminate trails. The NPS should work with representatives from FOGF to determine the optimum manner in which to access climbing sites. Redundant or unnecessary trails may be eliminated, while some trails may be targeted for stabilization and formal designation, while others may be closed to protect sensitive resources. Other management options include signing of management-preferred trails, and brochure, kiosk and poster information concerning trails.

Great Falls Park is truly a national treasure, as well 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 Great Falls Park. Once again, the Access Fund urges the Park to work with representatives from the Friends of Great Falls in exploring additional alternatives that would result in a more 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 GMP regarding planning goals, objectives, and strategies.

We look forward to working with you in the future to maintain climbing access and conserve the climbing environment at Great Falls Park.

Sincerely,

Shawn Tierney
Access and Acquisitions Director

Cc: Friends of Great Falls
Rick Potts, NPS National Wilderness & Recreation Programs Manager