



Protect America's Climbing



June 7, 2017

Buffalo National River Headquarters  
Superintendent Kevin Cheri  
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Harrison, AR 72601

Submitted via email: kevin\_cheri@nps.gov

**RE: BUFF Boxley Valley Comprehensive Area Plan Study Area Comments**

The Access Fund and Arkansas Climbers Coalition (ARCC) appreciate this opportunity to comment on the preliminary proposed action for Boxley Valley within Buffalo National River. This National Park Service (NPS) managed river corridor is both a treasured natural resource and valued recreational area. The Access Fund is pleased to offer its support to NPS, ARCC, and the local climbing community to protect and promote this unique resource as part of the park planning public comment process. Buffalo National River's extensive sandstone and limestone bluffs are an important resource to the Arkansas climbing community. Boxley Valley holds some of Buffalo National River's highest priority rock climbing resources. We request rock climbing be recognized and incorporated into the BUFF Boxley Valley Comprehensive Plan Study Area (the plan).

**The Access Fund**

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and conserve the climbing environment. A 501(c)(3) non-profit and accredited land trust representing climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 15,000 members and over 100 local affiliates. In addition to its leadership role in the climbing community, The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund upholds a current [Memorandum of Understanding with the National Park Service](#)<sup>1</sup>. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

**Arkansas Climbers Coalition**

The Arkansas Climbers Coalition (ARCC) is a 501(c)(3) non-profit advocacy and conservation organization representing the interests of Arkansas rock climbers. ARCC's mission is to preserve

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<sup>1</sup> See [https://www.accessfund.org/uploads/Access-Fund-NPS\\_MOU\\_-2014-2019.pdf](https://www.accessfund.org/uploads/Access-Fund-NPS_MOU_-2014-2019.pdf)

and protect climbing areas in The Natural State through communication, education and land stewardship. Founded in 2007, the ARCC currently has over 350 members and is an official local Affiliate of the Access Fund. ARCC partners with land owners and managers, such as Ozark National Forest, to provide stewardship and management support of climbing areas. For more information about ARCC, visit [www.arkansasclimbers.org](http://www.arkansasclimbers.org).

## Comments

The preliminary proposed action for Boxley Valley seeks to improve the visitor experience, safety and resource protection, through education, expanded visitor services and strategies to secure additional partner support funding<sup>2</sup>. We request rock climbing opportunities and access be incorporated into this plan moving forward to improve visitor experience, expand services and obtain partner support and funding. Buffalo National River's extensive sandstone and limestone bluffs have been identified as a valuable resource for the Arkansas climbing community. Boxley Valley specifically holds some of the highest priority rock climbing resources within Buffalo National River. As partners, Access Fund and ARCC can provide support and resources to help manage rock climbing in accordance with NPS management policies and mission.

### Climbing in Buffalo National River

Buffalo National River is an exceptional rock climbing resource, and one of the most significant in the South Central United States for its overall size, quality and rock type (primarily limestone, in addition to sandstone). The rock character and quality are outstanding, and opportunities for bouldering, traditional climbing and sport climbing are available at multiple sites, all in a beautiful Ozark mountain setting. Buffalo National River contains numerous bluffs and boulders along the ~135 mile long river corridor. The river corridor constitutes a regionally significant and extensive climbing resource, composed of numerous discrete climbing sites. Many of these sites are potential climbing destinations, in need of further assessment, and some have seen use by rock climbers<sup>3</sup>.

Climbing activity along the Buffalo began at least in the 1980s; however, recorded Arkansas climbing activity was documented in the late 1800s, suggesting the bluffs along Buffalo River saw climbing activity much earlier<sup>4</sup>. In addition to these climbing experiences, a wide variety of climbing settings are available, from more readily accessed front-country areas, to backcountry and wilderness settings that reward park users seeking adventure and solitude. The Boxley Valley planning area in particular contains the River's most well-known climbing sites, including areas of historic climbing use, and areas which are rated as the highest priority by the Arkansas climbing community for enhanced access and stewardship.

Boxley Valley includes the climbing resources listed below, and we recommend that these areas be incorporated into the plan for consideration. This list is not meant to be complete or comprehensive, and Access Fund and ARCC recommend a more comprehensive inventory of climbing resources.

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<sup>2</sup> BUFF Boxley Valley Comprehensive Area Plan Scoping Newsletter, 2017.

<sup>3</sup> April 7, 2017 meeting at BUFF Park headquarters in Harrison, Arkansas between Access Fund staff, park Rangers and park maintenance staff. The utility of Access Fund and ARCC assisting with creating a comprehensive climbing resource inventory was discussed; in particular, a climbing resource inventory was acknowledged to improve the park's ability to assess recreation and climbing opportunities, potential resource conflicts and address other management issues.

<sup>4</sup> Fennel, Cole. *Rock Climbing Arkansas* (Fixed Pin Publishing, 2015).

- Kyle’s Landing Area (Gray Rock and other portions of cliff)
- Steele Creek Area (Roark Bluff, Big Bluff, Roark Bluff and other sections of cliff)
- Compton Trailhead (Hemmed-in Hollow, Sneeds Creek, Hideout Hollow and Antannae Pine)
- Ponca Area
- Lost Valley
- Boxley Bridge (Beech Creek)
- Upper Buffalo Wilderness

Climbers have used some of the areas listed above since the 1980s or even earlier. They offer bouldering opportunities, single-pitch traditional and sport climbs, and even a few multi-pitch routes (over 150 feet long). Boxley Valley is home to some of the most significant climbing resources in the Buffalo National River system and these valuable recreational resources should be included and considered in the plan.

In previous meetings (2009 and 2017) with NPS, Access Fund and ARCC requested that NPS recognize climbing as an accepted activity in Buffalo National River and provide provisions to allow for the use of fixed climbing anchors by the climbing community. The use of strategic bolt placements is a critical safety tool for climbers, and can protect sensitive resources, such as cliff-edge vegetation, soils, and specimen cliff trees that might otherwise be directly used as rope anchors.

### **Managing Climbing in National Parks**

Climbing is recognized as an appropriate activity, in wilderness and non-wilderness, in nearly 25% of National Parks across the United States. A variety of management strategies are used to successfully manage climbing resources at NPS units. For instance, the use of fixed anchors and a “no top out policy” at Obed Wild and Scenic River, TN, has been successful in limiting the impact of climbing on cliff-edge habitat<sup>5</sup>. Research at Shenandoah National Park, VA, also supports this management strategy by recommending installation of fixed anchors on the cliff-edge to minimize damage to cliff-top trees and vegetation<sup>6</sup>. These NPS managed sites serve as examples of effective climbing management policies. In addition, the New River Gorge National River<sup>7</sup>, Zion National Park<sup>8</sup>, Joshua Tree National Park<sup>9</sup>, and Yosemite National Park<sup>10</sup> are examples of NPS effectively implementing fixed-anchor policies and managing other climbing-related activities. Great Falls National Park, VA provides an excellent example of NPS management strategies for riverside climbing areas.

### **Managing Climbing in NPS Wilderness**

Climbing in NPS Wilderness is managed under the guidelines provided Directors Order #41

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<sup>5</sup> See <https://www.nps.gov/obed/learn/management/upload/Obed-Final-Climbing-Management-Plan.pdf>

<sup>6</sup> See <https://www.nps.gov/shen/learn/nature/rock-outcrops.htm>

<sup>7</sup> See [https://www.nps.gov/neri/upload/neri\\_finalcmp.pdf](https://www.nps.gov/neri/upload/neri_finalcmp.pdf)

<sup>8</sup> See <https://www.nps.gov/zion/planyourvisit/climbing.htm>

<sup>9</sup> See [https://www.nps.gov/jotr/planyourvisit/good\\_climbing.htm](https://www.nps.gov/jotr/planyourvisit/good_climbing.htm)

<sup>10</sup> See <https://www.nps.gov/yose/planyourvisit/climbing.htm>

(Section 7.2): Wilderness Stewardship<sup>11</sup> and the NPS Reference Manual #41<sup>12</sup>. These documents recognize that climbing is a legitimate and appropriate use of Wilderness and provide guidance for NPS staff to manage climbing within individual wilderness areas. Potential climbing areas are located within Buffalo National River Wilderness. The Boxley Valley planning area contains Upper Buffalo Wilderness and Ponca Wilderness, both of which are home to valuable climbing resources. Ponca Wilderness is especially significant, due to the wide variety of available climbing experiences, a wild and scenic setting, and exceptional rock character and quality. We recommend that NPS recognize climbing as an appropriate Wilderness activity in Buffalo National River, particularly in Wilderness within the Boxley Valley planning area. Climbing is a legitimate and inspiring way for the public to experience Wilderness and Buffalo National River.

### **Risk Management and Multiple Use**

Many National Parks manage for multiple recreational uses while minimizing user conflicts and risk. Great Falls National Park along the Potomac River in Virginia, manages high levels of boating and river activities alongside climbing, hiking, fishing and horseback riding<sup>13</sup>. Obed Wild and Scenic River, Little River Canyon National Preserve, and New River Gorge National River also manage high levels of climbing use alongside boating and river activities, hiking and sight-seeing. Regarding risk management of fixed anchors, existing statutes indicate that public land managers can limit their liability by detaching from decisions regarding the placement and maintenance of fixed anchors<sup>14</sup>. Climbers and climber organizations have the expertise to install and maintain these anchors, and thus it is appropriate that climbers should provide this valuable community service.

### **Access Fund and ARCC Assistance and Partnership**

In June of 2009, the National Park Service and Access Fund finalized a Memorandum of Understanding to help frame a collaborative relationship between the NPS and the climbing community<sup>15</sup>. We request Buffalo National River, Access Fund and ARCC collaborate as the plan is drafted and finalized over the following years. The climbing community and the Access Fund are ready, willing, and able to help the NPS. The Access Fund and ARCC can assist in developing climbing management strategies in Boxley Valley and throughout Buffalo National River. Access Fund and ARCC can work with the NPS to provide a comprehensive inventory of existing and potential climbing resources and assist in assessing resource conflicts, improve trails and address other management needs. The local climbing community in Arkansas has a history of positive environmental stewardship and collaboration with government agencies at all levels of government, private land owners and other organizations to protect climbing resources. Access Fund strives to work with local climbers and land managers to address management needs. We also provide training on planning and stewardship best practices to keep those areas healthy. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program<sup>16</sup> or assistance from our Conservation Team<sup>17</sup> which helps maintain

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<sup>11</sup> See [https://www.nps.gov/policy/dorders/do\\_41.pdf](https://www.nps.gov/policy/dorders/do_41.pdf)

<sup>12</sup> See [https://wilderness.nps.gov/RM41/7\\_WildernessUseManagement/ClimbingGuidance.pdf](https://wilderness.nps.gov/RM41/7_WildernessUseManagement/ClimbingGuidance.pdf)

<sup>13</sup> See <https://www.nps.gov/grfa/planyourvisit/outdooractivities.htm>

<sup>14</sup> See <https://www.accessfund.org/educate-yourself/for-land-managers/risk-management-strategies>

<sup>15</sup>

<https://docs.google.com/viewer?a=v&pid=sites&srcid=Y2xpbWJpbmdtYW5hZ2VtZW50Lm9yZ3x3d3d8Z3g6MjU5YTUyYzQwOTM5YTAyMg>

<sup>16</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm).

climbing areas throughout the United States.

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Thank you for your consideration of these comments on preliminary proposed action for Boxley Valley. Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health and integrity of Buffalo National River and Boxley Valley. The Access Fund looks forward to continuing to work with NPS, please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the NPS to seek input from diverse groups and interests. Feel free to contact me via telephone (303-552-2843) or email ([erik@accessfund.org](mailto:erik@accessfund.org)) to discuss this matter further.

Sincerely,



Erik Murdock  
Access Fund Policy Director



Daniel Carnahan  
ARCC President

Cc:

Brady Robinson, Access Fund, Executive Director  
Zachary Lesch-Huie, Affiliate/Southeast Regional Director  
Katie Goodwin, Policy Associate  
Joe Sambataro, Access Director

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<sup>17</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm).

# CLIMBING IN WILDERNESS

The climbing community is deeply connected to wild places and relies on conservation of these landscapes to climb. By celebrating this connection, we help create the next generation of conservationists.

## CLIMBERS HAVE PLAYED A CRITICAL ROLE IN WILDERNESS AND CONSERVATION HISTORY

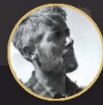
### JOHN MUIR

In the late 1800s, pioneer climber and second American Alpine Club president John Muir fought for the conservation of America's wild places, and was a key player in establishing the National Park system.



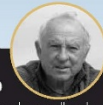
### DAVID BROWER

Prolific climber David Brower was instrumental in the 1964 signing of the Wilderness Act while he was the Executive Director of the Sierra Club.



### YVON CHOUINARD

Yvon Chouinard, groundbreaking climber and founder of Patagonia, helped develop environmentally friendly climbing techniques and gear. A dedicated conservationist, Chouinard has helped conserve many of America's wild places.



### DID YOU KNOW?

David Brower placed what is believed to be the first climbing bolt in the US, in 1938.

## THE WILDERNESS CLIMBING LANDSCAPE

### WHICH FEDERAL AGENCIES MANAGE WILDERNESS CLIMBING?

- 48% National Park Service
- 44% National Forest Service
- 6% Bureau of Land Management
- 2% Fish and Wildlife Service



### WHERE ARE WILDERNESS CLIMBING AREAS?



7% Total climbing sites, many of which are the most iconic in the US, are in designated Wilderness!



### FIXED ANCHORS

Climbing equipment left in place to allow safe ascent or descent of technical terrain.

## THE WILDERNESS CLIMBING ETHIC



All climbers are encouraged to follow the Wilderness climbing ethic:

1. Be respectful. It is a privilege to climb in these beautiful, wild places.
2. Be aware of and respect wilderness climbing regulations, restrictions, and closures.
3. Use removable climbing protection whenever possible.
4. Get appropriate authorizations from land managers before placing a fixed anchor.
5. Understand that bolts are used as a last resort and must be placed by hand.
6. Travel lightly to minimize impacts. Adopt Leave No Trace principles and climbing practices.

## BEST PRACTICES IN WILDERNESS CLIMBING MANAGEMENT



1. Know the land agency guidelines. The government has recognized climbing as an appropriate activity in our nation's Wilderness and acknowledges that fixed anchors are sometimes necessary tools for Wilderness climbing.
2. Involve the public. Stakeholder input is critical in managing safe climbing environments.
3. Recognize the importance of maintenance. Climbers should be allowed to maintain the safety of existing anchors in accordance with agency guidelines.
4. Allow provisions for emergencies. Climbers must have some level of control to make critical decisions regarding fixed anchor placements where no other options are available.
5. Broadly publicize any changes. Publicize changes to fixed anchors, climbing regulations, and diff closures to increase compliance and avoid compromising climber safety.



### THE NATIONAL PARK SERVICE OFFICIALLY LEGITIMIZED WILDERNESS CLIMBING IN 2013.

"Climbing is a legitimate and appropriate use of wilderness."  
— National Park Service Director's Order #41, Section 72, 2013



1 Based on all climbing sites in Mountain Project's LD database.  
2 Based on federal land ownership data and all climbing sites in Mountain Project's LD database.

Photos (from top): American Alpine Club Library  
Photo of Brower by 1940s-1950s  
Photo of Chouinard by Patagonia