

# Great Falls General Management Plan: Issues for Climbers

November 2005

## Introduction

**Friends of Great Falls (FOGF)** is a coalition of climbers from DC, VA, and MD who climb at Great Falls Park, Virginia, just outside Washington DC. FOGF includes both individual climbers and members of local clubs, notably the Potomac Mountaineering Club and the Blue Ridge Section of the American Alpine Club. FOGF was established in September 2005 to respond to the Great Falls draft management plan described below. Anyone involved in climbing at Great Falls can join this coalition – if interested, please contact [greatfallsaccess@gmail.com](mailto:greatfallsaccess@gmail.com). FOGF is also working with the Access Fund, which represents over 1.6 million climbers nationwide.

FOGF has established a website for information – [www.friendsofgreatfalls.com](http://www.friendsofgreatfalls.com) - and can be contacted at [greatfallsaccess@gmail.com](mailto:greatfallsaccess@gmail.com).

## What Do You Need to Do?

The National Park Service (NPS) has prepared a draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Great Falls Park. This can be found at <http://parkplanning.nps.gov/document.cfm?projectId=12998&documentID=12262>.

The draft GMP/EIS offers two choices, although that may change depending on the comments received. **Alternative A** is the “no changes” proposal, although as written this would reduce or eliminate access to some climbing areas. **Alternative B** would require a Climbing Management Plan, and proposes cliff closures, permits, permanent anchors.

**From various discussions with the NPS, we understand that Alternative B - or some equivalent - is the NPS intention, and they have already started planning for this. Alternative A is included because it is formally required to consider “no changes.”**

**FOGF wants climbers to comment to the NPS on the aspects of the draft GMP/EIS that would affect climbing.**

**Public submissions on the draft plan close on 15 December 2005.**

You can read the GMP/EIS of course, and we recommend this. To help you comment, we have prepared a policy statement that covers the items in the GMP/EIS that are a concern for climbers.

We cannot draft a generic letter, because that would probably be discounted by the NPS. When commenting make sure to write *in your own words* and state the following:

- Your name, address, and that you vote!
- Why you value Great Falls Park, how long you have been climbing there and how often that you go there.
- Be sure to state that you are commenting on Great Falls Park Draft General Management Plan/Environmental Impact Statement.
- Please adopt some or all of the policy stances we are proposing below.

We suggest you comment by email to [GWMP\\_Superintendent@nps.gov](mailto:GWMP_Superintendent@nps.gov) and copy your submission to [greatfallsaccess@gmail.com](mailto:greatfallsaccess@gmail.com).

This is so we know what is being said and how many climbers have commented.

## Friends of Great Falls Policy Statement

FOGF recognizes that the proposals in the draft GMP/EIS affect many Great Falls users, not only climbers. This FOGF policy statement is however restricted to issues involving recreational climbing.

### *General*

- The draft GMP/EIS favors resource protection over recreational use of Great Falls Park where climbing is concerned:
  - The draft GMP/EIS does not recognize the importance of Great Falls Park as a local and national climbing resource, the best climbing area within 3 hours drive of the DC area.
  - There is inadequate detail in the draft GMP/EIS to fully evaluate the impacts of the GMP/EIS proposals on climbing.
  - Alternative B, the NPS preferred choice, could end recreational climbing at Great Falls if implemented as proposed.
  - There is no evidence in the GMP/EIS indicating that climbing is an issue at Great Falls in terms of impacts on natural resources
- Climbers are very willing to work with the NPS to meet NPS concerns:
  - FOGF recommends that as part the GMP/EIS process, the NPS agree to a process of interaction with the local climbing community, for example through FOGF, which has been set up explicitly for this purpose
  - This process should be recognized formally in the GMP/EIS or through a Memorandum of Understanding.

### *GMP/EIS Proposed Alternatives*

- FOGF is in favor of Alternative A, the “no changes” proposal. This effectively means climbing would continue as at present, except for access to Gorky Park, the MicroDome and the Flat Iron.
- The NPS preference is clearly for Alternative B or a related plan. Alternative B needs considerable modification in terms of the proposals for climbing:
  - The draft GMP/EIS suggest that there may be permits to control access, permanent anchors, and the closure of cliffs. There are no details provided and these proposals are excessively broad.
  - These proposals need to be **removed** from the GMP/EIS. In their place, the GMP/EIS should describe the formal process for interaction with the local climbing community, and the process for creating a CMP should this be developed.
  - There is no need to include in the GMP details that would better be placed in a CMP if developed. Leaving such broad policies in the GMP also completely circumvents the involvement of the local climbing community.
- We understand that under both alternatives access to Gorky Park, MicroDome and the Flat Iron will be closed for general visitor safety and to limit the impact of invasive plants. The MicroDome in particular is a superb climbing resource, with climbing unlike the other Great Falls cliffs:
  - The NPS has acknowledged that there are routes that will allow climber access to these cliffs while meeting NPS concerns. Rules of usage for these cliffs should be prepared jointly with the local climbing community, and incorporated in a CMP should that be developed.
  - The NPS has indicated that it is likely to require permits for climbers to access these specific areas. Such permits, **as long as they relate to these three areas only**, are regarded by FOGF as an acceptable compromise. Permits for access to these cliffs must be free, available routinely on the day at Great Falls without requiring advance notification or any other administrative procedures

### *Climbing Management Plan (CMP)*

- A CMP, as proposed under Alternative B, is unnecessary. There has been climbing at Great Falls for 85 years, with minimal impact on the park. Climbing is a small activity in the park in terms of area and in the GMP/EIS is singled out without any evidence as an activity requiring regulation.
- Should a CMP be proposed in the revised GMP, this must be prepared collaboratively with the local climbing community, including FOGF. The details of the process – procedural, legal - that will be followed to prepare a CMP need to be included in the GMP/EIS or through a Memorandum of Understanding.
- Any CMP should clearly spell out:
  - Climbing at Great Falls does not require a permit.
  - ⊖ Details of circumstances under which climbing areas may be considered for closure, the reasons for this, and the process to be followed before such closures are implemented. **It is not acceptable for any CMP (or GMP) to state that the closure of cliffs is solely the decision of the NPS.**
  - ⊖ If closure of cliffs is being considered because of resource issues (i.e. plant protection), scientific evidence of the need for this **must** be a requirement, and indicated as such in the CMP
  - Policies regarding anchors (described later).

### *Alternative B - The NPS Preference*

- Any decisions on closing “social” paths should be on a case-by-case basis. As regards paths to climbing areas, which may be classed as “social” by the NPS, it is acceptable to reroute these to minimize impacts (visual, resource impact) provided access to the climbing areas remains possible. It is not acceptable to restrict access to climbing areas by closing existing paths without replacement.
- Permits should not be required for recreational climbing at Great Falls. Permits should not be used to restrict access as suggested in Alternative B. The proposal in the draft GMP/EIS – permits applied for in advance, used to restrict access - would end recreational climbing at Great Falls.
  - For commercial groups – permitting as currently required should continue
- Permanent anchors are not needed at Great Falls. If permanent anchors are installed at any cliffs, the choice of anchors, locations, and rules for usage should be jointly decided with the local climbing community/FOGF and reference to a requirement for this joint effort should be in a CMP
  - Alternative B in the draft GMP/EIS implies that permanent anchors could be installed to define permitted climbing routes. FOGF completely rejects the implication that allowed climbing routes can or should be defined by the existence of permanent anchors.
- Alternative B indicates that unspecified climbing areas might be closed in the future to protect rare resources (plants) from climber impact:
  - There is no scientific evidence that climbers have been responsible for the impacts implied by the draft GMP/EIS.
  - The scientific reports referenced in the draft GMP/EIS are old, incomplete, and in some cases, unavailable to the public. This is not an adequate basis on which to make far-reaching decisions, particularly FOGF is denied the opportunity to review the assessments (as is currently the case).
  - Climbers are environmentally conscious, and would consider and honor access restrictions where the need for these can be demonstrated. However the draft GMP/EIS implies closure of cliffs is the only means of protecting rare resources. FOGF believes it may be entirely feasible to protect natural resources by other measures.