

Friends of Great Falls
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Analysis of Public Comments on the Great Falls Draft General Management Plan (GMP)

June 2006

In March 2006, the National Park Service (NPS) allowed members of Friends of Great Falls (FOGF) to review the submissions that were filed during the period of public comment. We appreciate the assistance of the NPS in providing early access, and this report summarizes the results of the review by FOGF. The methodology used to prepare the summary included copying and tallying the comments by demographic information and subject matter issues.

1. Demographics of Public Response

270 comments received by the NPS:

- ◆ 206 from individual climbers and 12 from climbing organizations
- ◆ 6 from individual hikers and 2 from hiking organizations
- ◆ 3 from environmental organizations
- ◆ 4 from people and organizations with botanical expertise
- ◆ 1 from a mountain biking organization
- ◆ 1 from a kayaking organization
- ◆ 15 from equestrians and 2 from equestrian organizations
- ◆ 5 from neighbors of the park and 1 from a neighborhood organization
- ◆ 6 from government agencies
- ◆ 8 miscellaneous

Geographical location:

- ◆ 122 VA
- ◆ 73 MD
- ◆ 29 DC
- ◆ 8 CO
- ◆ 2 CA
- ◆ 2 UT
- ◆ 1 from each of AK, ID, LA, MA, OR, PA, WV
- ◆ 4 foreign countries
- ◆ 18 unidentified

2. Summary of Individual Comments

Nearly 300 individuals and organizations commented on the draft Great Falls General Management Plan/Environmental Impact Statement. Individual climbers filed about 75% of the responses (206 out of 270). In addition, twelve organizations and groups relating to climbing filed comments. The remaining comments came from hikers, neighbors and residents living near the park, individual equestrians and equestrian groups, environmental groups, off-road biking organizations, kayaking associations, and local, state and federal government organizations.

The summary below reflects a breakdown of the responses filed by climbers. Generally, climbers overwhelmingly expressed the view that climbing should be recognized as an important activity at Great Falls National Park. About half the climbers addressed climbing issues generally and outlined the personal climbing and outdoors experiences of their families, friends, and themselves in the Park. They implored the NPS to protect climbing resources and access to climbing in the Park. The other half of the climbers' comments reiterated that general view, but, in addition, substantively addressed specific issues raised in the Plan such as permits, anchors, specific climbing areas, plant management, alternatives, trails, education, administration and other issues.

Detailed study of the responses has revealed that climbers' individual comments often addressed only those issues on which they felt most strongly. Consequently, the reported percentages reflect the number of comments on particular topics and do not imply that these were not also of issues of concern to those who did not mention them specifically, albeit less of a priority. In particular, the absence of a comment on a particular proposal in the draft plan cannot be interpreted as support for or acceptance of that proposal.

CLIMBING IN GENERAL

The climbers (~ 40%) who addressed this issue stated that Great Falls Park is an important natural and recreational resource and that recreational uses in an urban area should be distinguished from those in a wilderness area. Many mentioned that climbing at Great Falls was an important climbing resource and that climbers are historical users of the Park. Also, they mentioned that climbing has less impact than other activities such as hiking, biking, sight-seeing, riding, or fishing, and should not be singled out for restrictions.

CLIMBERS' RESPONSIBILITY

The climbers (~40%) who mentioned this issue stated that as a group, climbers are environmentally conscious, active in cleanup and preservation. Further, comments stated that on a personal and on a group level; climbers should be involved in plans concerning climbing and are willing to be involved in planning with the NPS. Some addressed the possibility of a climbing management plan and advocated strong climber inclusion in the development of such a plan.

CLIMBING AREAS

Nearly all climbers (about 80%) expressed opposition to restrictions at or closures of climbing areas. Most cited the lack of scientific evidence that climbers had caused impacts and that

closure or restrictions should not occur without scientific evidence of climber impact. A few climbers mentioned that reasonable voluntary measures could be implemented, instead of restrictions or closure, through cooperation with climbers and climber organizations. Some mentioned that climbing takes place only on a minimal portion of the cliffs, on specific vertical rock faces in specific areas identified in climbing guidebooks.

MICRODOME – FLAT IRON - GORKY PARK AREAS

Roughly 20% of the climbers specifically mentioned climbing in the Microdome, Flat Iron, and Gorky Park areas. Comments stated that these areas contained historically important and difficult climbing that should not be closed or limited. Several responses addressed possible alternative access trails to these areas or specifically marked climber-only trails.

PERMITS

Nearly unanimously, climbers who addressed the subject of permits objected to a permit system as being impractical, unduly burdensome; that it would not fit the nature of climbing; that it would create many administrative and policing problems and expenses; that there was no evidence that a permit system was necessary; that it would not solve any demonstrated or perceived problems with current use; that a permit system would be unfair and discriminatory to climbers if hikers, bikers, riders, picnickers, fisherman, and other users were not similarly regulated by permits. A few climbing organizations were willing to accept permits for concessionaires and schools.

ANCHORS

Most climbers who addressed the issue of fixed anchors were opposed to anchors. They focused on the impracticality of the number of anchors needed to protect all climbs, the close proximity of climbs, the quality and angle of the rocks, liability and administrative issues. They also objected to anchors to designate or restrict climbing and many pointed to the satisfactory current use of vegetation or other means for anchors. Several climbers and climbing schools would support some anchors but only if climbers were jointly involved in planning with the NPS. Several comments also noted that rappelling into the gorge is impractical and could be dangerous for non-climbing users.

ALTERNATIVES A AND B

Of the 40% of climbers who specifically addressed the alternatives described in the draft Plan, nearly all preferred Alternative A, the no-action status quo alternative with the exception of closing Microdome, Gorky Park, Flat Irons, and restrictions on Sand Box. Commenters stated that there was inadequate proof or evidence to support the actions proposed in alternative B, that the draft Plan failed to consider less restrictive measures, and was inconsistent with NPS policy and other statements. Several comments said that reliance on a single 1996 visitor study was invalid to measure climber use, trips, and climber impacts, and was also an invalid cross-sectional tool to use with plant studies.

RARE PLANT MANAGEMENT

Many of the comments mentioned the issue of plant management, specifically for rare plants discussed in the draft Plan. Many climbers expressed near outrage concerning the lack of the basis for statements in the draft Plan concerning impact from climbing activities. They pointed to the environmental concern that climbers have for plants and noted the small area and verticality of the climbing areas. Many comments objected to the validity and age of the plant studies relied on by the NPS, and the lack of access and availability of underlying information regarding the plants and their location. Some comments questioned the use of the term regionally rare and the proper use of state and federal plant lists. Several stated that a rare plant management plan may be needed which should include a study of all user groups and alien plants for impact, and include development of options for preservation. Many mentioned that users including climbers could be educated about plant issues.

TRAILS

A number of climbers commented on trail issues. Many stated that climbers do not necessarily create social trails; that trails to climbing areas are already clearly designated in the climbing guidebooks; that trails to climbing areas tend to be on rock surfaces and not on vegetation; and that trail management and closure of social trails should not be used to limit cliff access or restrict climbing; that climbers should be involved in any trail management plan for the Park with other user groups.

EDUCATION

Many climbers commented that education should be used as an important management tool for the Park resources including plant management and recreational use. They also suggested that educational materials on plants and other issues could be prepared for users, and that signs on trail posts could be used to educate climbers and other users on resources issues.

COOPERATION WITH OTHER GROUPS

Many climbers stated that they and their families participate in many other activities in the Park in addition to climbing. They pointed to hiking, biking, kayaking, horseback riding, sightseeing, viewing the falls, and visiting exhibits. They addressed issues related to these activities and expressed support for cross-cutting issues such as connecting trails outside the Park, maintenance of trails and facilities, clean-up, traffic and parking, plant and wildlife issues, signs and education of visitors. Many commenters listed memberships and activities in various environmental, climbing and other recreational organizations.

3. Summary of Organizational Comments

The groups that commented were:

Users:

- ◆ Friends of Great Falls (FOGF)
- ◆ Sheclimbers organization
- ◆ Potomac Appalachian Trail Club/Mountaineering Section (PATC/MS)
- ◆ American Alpine Club (AAC)
- ◆ The Access Fund (AF)
- ◆ Great Falls Trail Blazers (GFTB)
- ◆ Potomac Heritage Trail Association (PHTA),
- ◆ American Whitewater (AW)
- ◆ Int'l Mountain Bicycling Assoc, Mid Atlantic Off-Road Enthusiasts (MORE)
- ◆ Great Falls Equestrian Society (GFES)

Park and planning agencies:

- ◆ Fairfax County Park Authority (FCPA)
- ◆ Fairfax County Countywide Non-Motorized Transportation Committee (NMTC)
- ◆ Fairfax County Department of Planning and Zoning
- ◆ Fairfax County Park and Planning, Planning and Development Division
- ◆ Commonwealth of Virginia Department of Environmental Quality
- ◆ U.S. Environmental Protection Agency, Region III

Conservation Organizations:

- ◆ The Nature Conservancy, Maryland/District of Columbia Chapter (TNC)
- ◆ Potowmack Chapter, Virginia Native Plant Society (VNPS)
- ◆ Potomac Conservancy
- ◆

Neighborhood:

- ◆ Great Falls Citizens Association (GFCA)
- ◆ Great Falls Park and Potomac River Association.

RECREATIONAL USE AND PROTECTION OF NATURAL RESOURCES

The AAC quoted NPS national management policy to indicate that the draft GMP cannot impose regulations on an activity without scientific research or other data showing that there are unacceptable resource impacts. The AAC also noted that the NPS did not attempt to address inappropriate visitor impact through visitor education or other minimally intrusive actions. The AAC and FOGF both note inconsistencies and inadequate rationales to conclude that Alternative B is fatally flawed and offer to work collaboratively with NPS to correct it.

WORK WITH RECREATIONAL USERS

Almost all these organizations encouraged the NPS to involve the recreational users, especially the climbing community, in the development of climbing and trail management plans. The American Alpine Club, the Access Fund and FOGF stressed the climbing communities' support of the environment and recommended the NPS work with the FOGF in revising the draft GMP and in the development of a climbing management plan. Both the Nature Conservancy and the local chapter of the Virginia Native Plant Society said the same, while the latter called for the NPS to work especially with the climbing community to protect sensitive plant resources on trails leading to the bedrock terrace.

PERMITS

Climbing organizations are against permits as impractical to issue and to enforce, though these might be acceptable for the Microdome area because of the minimal use, and the need to discourage access by the general public. Also, permits should not be used to limit climbing. The Equestrian Society is against permits as an inconvenience.

ANCHORS

FOGF believes there is no need for permanent anchors. FOGF and the Access Fund note the actual need for and role of fixed anchors must be established before any management response.

TRAILS

Climbing, hiking and the equestrian organizations are against closure of all social trails but acknowledged that some social trails that were not essential could be closed and in some cases relocated. The Fairfax County parks and trails agencies supported closure of some social trails particularly in the northeast and southwest portions of the Park to protect sensitive plant communities. They also strongly stressed that the Park trails should connect with the County's trail network for hikers, bikers, and horses, along with the Potomac Heritage Trail Association. The Potomac Heritage Trail should be an integral part of the Park trail system and allow for bicycling and horses.

The off-road bikers group, MORE, cited their partnership agreement with the National Parks and Rivers Program and sees Great Falls Park as an ideal environment for mountain biking with its connections to the Fairfax County trails system and cited the need for the GMP to implicitly state that the Potomac Heritage Trail in the Park is bicycle and horse "friendly."

The GF Equestrian Society does not want social trails closed because of access to private land trails and loss of existing horse trails. Re-routing existing trails, improved directional signage and improved trail surfacing should protect natural and historical resources.

Most of the above groups made the point there was no evidence of the supposed adverse impact on the sensitive plant communities to warrant the closure of trails or exclusion of connections with outside trails.

The conservation organizations supported closing social trails, especially in the two areas mentioned above, and relocating horse trails away from natural and cultural resources, as at Mine Run.

CLIMBING AREAS

The climbing organizations are against closure of climbing areas citing the lack of any evidence of adverse impact on the sensitive plant communities. However, there is tacit acknowledgment that the current access to the Microdome – Flat Iron area across the prairie environment could be closed because the existing trail was a source for the spread of invasive plants. None of the conservation organizations called for closure of actual climbing areas.

INVASIVE PLANTS

TNC and the VNPS strongly recommended the development of an Invasive Plant Management Plan and offered their assistance.

PARK FACILITIES

The need for new facilities was questioned by the conservation group, mainly on the basis of the environmental impact.