

CHAPTER 6.0 CONSULTATION AND COORDINATION

6.1 PLANNING PROCESS AND PUBLIC INVOLVEMENT

The process to prepare a GMP/EIS for Great Falls Park began in September 2002. The NPS assembled an internal team to develop a preliminary list of issues that needed to be addressed in the GMP/EIS. Public scoping was conducted between December 2002 and February 2003. The park published a newsletter (Newsletter 1, dated January 2002) where it sought input on the concerns and issues that needed to be addressed in the GMP/EIS. This newsletter was sent to area residents and governmental agencies, and made available to park visitors. As part of the public scoping process, the park also held a public open house on January 28th, 2003.

Following the scoping process, the planning team explored several alternative scenarios to manage the park. A second public consultation process was undertaken in the Fall/Winter of 2003 where the park presented three alternatives for evaluation in a second newsletter (Newsletter 2, dated November 2003). These alternatives were revised and consolidated, subsequent to more than 190 public and agency comments that were received, as well as additional review by the internal planning team.

The park prepared a Draft GMP/EIS which was distributed to applicable review agencies, organizations and interested citizens in June 2005. In addition, the park conducted an open house on September 17th, 2005 to receive comments on the draft plan. Another newsletter (Newsletter 3) was published in October 2005 to clarify some concerns that were raised at the open house and to correct some inconsistencies in the draft plan. The park received more than 200 comments during the public comment period that ended on December 15th, 2005.

Following a review of the comments that were received, the park has revised the two alternatives, as presented in the Final GMP/EIS. Also, the park has prepared responses to the substantive issues that were raised in the public and agency comments. These are provided in the following section (Section 6.2 Responses to Substantive Comments Received on the Draft GMP/EIS).

At the conclusion of the planning process, the NPS will make its determination on the GMP/EIS pursuant to NEPA and issue a Record of Decision (ROD).

6.2 RESPONSES TO SUBSTANTIVE COMMENTS RECEIVED ON DRAFT GMP/EIS

Written comments were received on the Draft GMP/EIS from a variety of public agencies, organizations, and individuals during the public comment period that began on August 15th 2005 and ended on December 15th 2005. Oral comments were received at the public open house, held on September 17th 2005 at Great Falls Park. All comments received or postmarked during the public comment period were reviewed and analyzed.

The park has prepared responses to all substantive issues and concerns that were raised in the comments received. These issues and concerns are categorized by general topics, and described in greater detail through representative quotes from the comments that were received. Complete comments from public agencies and community organizations are included at the end of this chapter (under Section 6.3)

6.2.1 Alternatives

Issue 6.2.1.1: Support for Alternative A presented in the Draft GMP/EIS, with concerns.

Representative Quote: I approve of the “Alternative A” approach, providing for no changes to the current climbing access availability at Great Falls (I approve of restrictions at the sites known at Gorky Park, MicroDome, and Flat Iron). I feel that the draft, as written, is unfair to climbers, did not provide for appropriate independent study of the site, and used outdated information.

Response: As described under Section 2.1.2 (Alternative A - Continue Current Management Practices) of the Final GMP/EIS, climbing activities in the park would continue similar to current conditions, with no restrictions at the Gorky Park, Microdome and Flat Iron climbing areas.

Issue 6.2.1.2: Support for Alternative B presented in the Draft GMP/EIS, with concerns.

Representative Quote: I strongly urge you and the National Park Service to work with Friends of Great Falls (FOGF) to revise Plan B so that it will be more palatable to the climbing community, while continuing to observe the preservation concerns of park management

Representative Quote: I believe that Alternative B would be more justified and scientifically sound if it presented the intent to further study the interactions of all park users and these sensitive resources and to initiate more focused actions where there is more evidence to support them, rather than generalized policies such as Parkwide permitting.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS, the NPS will prepare a Climbing Management Plan (CMP) to manage climbing activities, and a Trails Management Plan (TMP) to manage hiking, mountain biking, and horseback riding activities throughout the park. Both of these plans will be prepared with extensive coordination and input from

the public including, the local rock climbing, horseback riding, hiking and mountain biking communities, as well as park neighbors.

The NPS has initiated a study to assess the potential impacts of climbing on cliff habitat and rare plant species. Similarly, the NPS is planning to conduct a study to evaluate the impacts of trail activities on sensitive natural and cultural resources. Both of these studies would provide scientific information to guide the management policies that would be adopted as part of the CMP and TMP.

Issue 6.2.1.3: Range of management alternatives proposed for evaluation in the Draft GMP/EIS.

Representative Quote: Preparing a GMP/EIS with only one action alternative and a clearly unacceptable "no action" alternative does not suggest much thought was devoted to developing a range of reasonable alternatives that provide differing alternatives regarding the Park's management.

Response: Several additional management alternatives were developed for the park, but were eliminated due to either public feedback, significant potential impacts on park resources identified early in the environmental review of the project, or operational concerns. These include three alternatives for the future use and management of Great Falls Park that were presented for public evaluation in the Alternatives Newsletter (Newsletter #2) that was released for public review in November 2003. The alternatives that were developed during the preparation of the General Management Plan for the park are briefly described under Section 2.4 (Alternatives Considered but Eliminated) of the Final GMP/EIS.

Issue 6.2.1.4 Modify Management Prescriptions.

Representative Quote: In the FEIS, include continued provision of unique recreational experiences, especially to specialized recreation activities such as kayaking and rock climbing, in the management prescription for the Mather Gorge Zone. NPS officials have publicly stated that visitor safety is not the number one concern; nor is there any instance of demonstrated resource damage. Therefore, providing unique and challenging recreation opportunities should be included in the stated management prescription for this zone.

Response: As described under Section 2.3.3 (Mather Gorge Zone) of the Final GMP/EIS, the NPS would continue to provide unique and challenging recreation opportunities in this zone. As stated in the document, "The Mather Gorge Zone would provide visitors with opportunities to view the Potomac River, as well as to pursue recreational activities such as rock climbing, hiking, boating and fishing in designated areas."

6.2.2 Affected Environment

Issue 6.2.2.1: Need for corrections and additions to text regarding natural resources.

Representative Quote: Plan does not clearly reference the sources of the names, the taxonomic concepts, and the conservation ranks of the rare communities. The meaning of the "G" and "S" ranks are not explained (the criteria are different for communities than for species), and, from the explanation given to climbers at the October 24th meeting, it is apparent that there is confusion among National Park Service staff about who recognizes the taxonomic units and defines global ranks. The community names listed in the Plan are colloquial, sometimes they match those listed for equivalent concepts that can be found on Natureserve's Explorer website (<http://www.natureserve.org/explorer/>); sometimes they do not. I assume that both the source of the taxonomic concepts themselves and the state and global ranks are opinions of either the conservation organization, NatureServe or the Virginia Natural Heritage Program, but it is impossible to understand this from the document, as the Plan cites neither the source of the names or ranks nor the equivalent Latin names (as was done for the species).

Representative Quote: NPS uses the phrase "regionally rare" to bolster its argument for protecting certain plant species. Without being clearly defined, the phrase has no meaning and cannot be used in and of itself as a supporting argument. In the document, NPS needs to explain the phrase, including what body made the designation and the geographic boundaries that are used. For example, does the "region" include the other side of the gorge in Maryland, or does it only refer to Virginia. In the document, NPS should also state that none of the plants in question are listed as either "Threatened" or "endangered" as defined by the Endangered Species Act.

Response: The Final GMP/EIS has been updated and provides this information under Section 3.3.3 (Biological Resources) and Appendix E (Rare, Threatened and Endangered Species Status and Description of Ranking).

Issue 6.2.2.2: Missing source information.

Representative Quote: The source of the maps of the rare communities is not cited.

Response: The Final GMP/EIS has been updated and provides this information below each map in the document.

Issue 6.2.2.3: Need information on federally listed threatened or endangered species in the park, if any.

Representative Quote: In the FEIS, clearly state whether any federally listed threatened and endangered species are known to reside in the Park; provide a listing of any all such species, and describe their status in terms of recovery. Otherwise, state none are found.

Response: There are no federally listed threatened or endangered species located at Great Falls Park. This is stated in the updated Section 3.3.3 (Biological Resources) of the Final GMP/EIS.

Issue 6.2.2.4: Development of strategies to manage invasive plant species.

Representative Quote: p. 2.15 (Resource Condition or Character) Nowhere in this document is the impact and management of invasive introduced species adequately addressed. Currently, the natural vegetation over much of Great Falls Park is being overrun by invasive exotic plants, including (but not limited to) Japanese stilt-grass (Microstegium vimineum), Chinese wisteria (Wisteria sinensis), garlic-mustard (Alliaria petiolata), Japanese honeysuckle (Lonicera japonica), bush-honeysuckle (Lonicera maackii), vinca (Vinca minor), and many others. The spread of these exotics is often compounded by other activities including excessive herbivory of native species by white-tailed deer, horseback riding, disturbance of soils by visitors, and Park management and construction activities. Managing invasive species will be absolutely critical to "preserving natural resources and settings." Without a commitment to such management, the viability of many natural communities in the Park will be heavily compromised in the near future. Although a cooperative project with The Nature Conservancy for spot control of invasives in critical areas is currently underway, much more will be needed in the future. If this is not the correct place in the document to address this issue, it should be spelled out in no uncertain terms elsewhere.

Response: The Park acknowledges the importance of preserving the viability of natural communities found at Great Falls Park through exotic invasive plant management. Natural Resource Management staff will continue to work with the National Capital Region's Exotic Plant Management Team (EPMT), The Nature Conservancy and volunteer groups to target invasive plant infestations and coordinating activities to control them. The cooperative project with The Nature Conservancy, however, is dependent on future funding. Great Falls Park also follows guidance included in a plan entitled, *A 5-Year Plan for Invasive Exotic Plant Treatments Along the George Washington Memorial Parkway 2004-2008*.

Issue 6.2.2.5: Validity of Taxonomy.

Representative Quote: Of the three plant species of concern named at the public meeting in September, one species, Amelanchier nantucketensis, is of questionable taxonomy, "suspected of being an apomictic species or a stabilized hybrid, perhaps same as plants previously called Amelanchier stolonifera var. micropetala"; (Natureserve, 2005). Its status is correspondingly listed as questionable. While the status of another species, Solidago simplex var. racemosa, is listed as S1 (five or fewer populations in the state of Virginia), the number of individuals comprising the population found in the Gorge appears to be in the thousands. I would hope that even if data will not be made public, the effect of recreational activities on the plant population as a whole would be the focus of any impact study.

Response: The status of *Amelanchier nantucketensis* cited on Natureserve seems to be following what is cited in Gleason and Cronquist (1991) Manual of Vascular Plants of Northeastern United States and Adjacent Canada. However this is not the current (though unpublished) thinking of plant taxonomists dealing with *Amelanchier* species who believe that *A. nantucketensis* warrants status as a distinct species. NPS management policies call for protection of all state listed species (individuals, not populations) regardless of their abundance within a park. To take a view contrary to this could allow for destruction of large portions of a population, provided some plants remain. This would not be consistent with NPS management policies.

Issue 6.2.2.6: Need for Clarification

Representative Quote: The third sentence in the first paragraph on page 3.36 contradicts the third sentence, second paragraph on page 3.34, with regard to the “viability” of terrace communities in Great Falls Park. One sentence states these communities have “good viability” and one sentence states these communities have “fair viability”. Which is correct? Recommendation: In the FEIS, clearly describe what the viability of the terrace communities has been determined to be, and include a discussion of the methodology used to determine this.

Response: The comment on page 3.36 of the Draft GMP/EIS erroneously identified terrace communities “to have only fair viability”. That portion of the study was discussing upland forest habitat and not terrace communities. The text has been corrected in the Final GMP/EIS and identifies the following:

- “Overall, terrace communities in the Gorge are considered to have good viability based on good size, good landscape context and the fair condition of resources (Nature Conservancy 2001).” (Page 3.34)
- “Overall, upland forest habitat in the Gorge are considered to have only fair viability based on the fair condition of resources, fair landscape context and poor size (Nature Conservancy 2001).” (Page 3.37)

6.2.3 Supporting Data for Impact Analysis

Issue 6.2.3.1: Need for scientific data to support decisions and impacts identified for changes to climbing activities under Alternative B (Preferred Alternative).

Representative Quote: Closures of any climbing areas in Great Falls Park must be based on scientific proof and it must be demonstrated that climbers are causing the destruction of the natural environment in these areas. As it is currently worded, the draft plan does not provide a sound, scientific justification for the closure of these three climbing areas. In addition, the National Park Service should explore all options to protect natural resources before closing a climbing area. I believe that in many cases, it is possible to protect natural resources by measures other than closing a climbing area.

Representative Quote: Botanical studies conducted in 1993 and 1994 are out-of-date and only represent a snapshot conducted at a certain point in time. To support the climbing restrictions and adequately address the impact of climbing on plant populations, a more recent study should have been conducted over a several year period. This type of timeseries approach is really the only way to control for the effect of other variables that could be impinging upon plants in specific climbing areas. Cross-sectional studies conducted over a limited period are not adequate for evaluating the impact of climbing on specific areas.

Representative Quote: Simply stating that a plant is “regionally rare” does not automatically justify restricting human access to an area simply because said species is, or may be found there.

Response: As identified under Section 2.1.2 (Alternative B - Preferred Alternative), the NPS has initiated a study ("Assessment of Climbing Impacts on Cliff Habitat and Rare Plant Species at Great Falls Park, Virginia and C&O Canal National Historical Park, Maryland") that will include developing and applying objective methods for assessing trampling-related impacts from visitors along trails, at cliff-top and cliff-base vistas, at recreation sites, and from climbers on the cliff-face. Rare vascular plants and many non-vascular plants (e.g. lichens, mosses, liverworts) will also be surveyed in the vicinity of cliffs, as these areas have been omitted in most previous surveys. If impacts to rare plants or rare plant communities are detected, they will be documented and investigated, and recreation management practices designed to avoid or minimize associated resource impacts will be identified. This study has a tentative completion date of 2009. Under Alternative B (Preferred Alternative), the NPS would prepare a Climbing Management Plan (CMP) that will be based on the information gathered for this study.

Issue 6.2.3.2: Need for scientific data to support decisions and impacts identified for changes to horseback riding or mountain biking activities under Alternative B (Preferred Alternative)

Representative Quote: The Management Plan implies that horses are damaging resources within the Park, but does not provide enough specifics for us to address the issue. We believe most trail erosion is caused by heavy rain - not horses or bikes.

Representative Quote: No scientific studies show that mountain bikers cause more wear to trails than other users.

Response: As identified under Section 2.1.2 (Alternative B – Preferred Alternative), the NPS will conduct a scientific evaluation of sensitive natural and cultural resources impacts resulting from trail activities. If impacts are detected, they will be documented and investigated, and recreation management practices designed to avoid or minimize associated resource impacts will be identified. Under Alternative B, the park would prepare a TMP that will be based on the information gathered for this study. The purpose of the TMP would be to ensure that horseback riding, hiking, and mountain biking activities, as well as access to

key areas for other activities such as climbing or interpretation, continue on designated trails in the park, but in a manner that is consistent with the NPS's responsibility of protecting park resources. The TMP will recommend best practices, especially in areas where trails are located within or adjacent to sensitive resources and would discuss the need for management strategies.

6.2.4 Environmental Consequences

INTERPRETATION

Issue 6.2.4.1: Provide visitors education about sensitive plants.

Representative Quote: I would like to see a proposal in the management plan to develop signage in the park that would educate visitors on the unique natural habitats of the park – particularly the bedrock terrace, the bedrock floodplain, and the swamp. Although there is signage about the cultural and historical aspects of the park such as the old Patowmack Canal, there is currently no signage about the rare natural communities and the need to protect them.

Representative Quote: Educate the climbers. Instead of making it virtually impossible to climb at Mather Gorge, have signs with photos at the tops of cliffs showing and naming the "sensitive" plants. Give climbers a sense of their own responsibility in protecting these species.

Representative Quote: Particularly when the park is closing trails to protect these rare communities, it is very important to educate visitors about why these areas need to have limited access. The signage on the boardwalk trail to Olmsted Island across the river at Great Falls, MD would be a good model for signage at Great Falls Park. Signage should be placed near the natural communities but not at them as even small construction projects disturb the habitat and visitors reading the signs would likely compact the nearby soil.

Response: Earlier in 2006, the NPS installed 14 new interpretive trailside exhibits that interpret the significance of the Potomac Gorge, as well as the relationship of the gorge with the Chesapeake Bay watershed. In addition, under Alternative B - Preferred Alternative (as discussed in Section 2.1.2 of the Final GMP/EIS), NPS would expand the interpretive programs at the park with additional educational materials and exhibits. These materials and exhibits would be located at the visitor center and on-site at some of the resource areas. The interpretive programs would be aimed at enhancing a visitor's experience and understanding of the cultural and natural features that contribute to the park's significance. These features include the Patowmack Canal, Matildaville, the Potomac Gorge, the Potomac River watershed, and the linkage to the area's American Indian heritage. The programs would also focus on promoting safety and providing guidance on how to recreate in a manner that minimizes impacts on the park's resources.

NATURAL RESOURCES**Issue 6.2.4.2: Need for identification of the amount of clearing required to locate US Park Police horses off of Jackson Lane.**

Representative Quote: The construction and use of a new on-site Park Police horse facility is likely to promote the invasion and spread of non-native plant species. If the facility must be moved on-site, it should be constructed in already cleared areas, avoiding the loss of additional Forestland, and the contractors should use best management practices to minimize surrounding forest habitat disturbance and prevent the spread of invasive species.

Representative Quote: Page 4.16 states that, "The area off Jackson Lane is mostly wooded with some clear areas. Developing stables and a paddock area for horses may require clearing some of the existing vegetation in this area and could result in a minor adverse impact." The DEIS does not specify the approximate acreage of clearing needed nor does it delineate the vegetation that may be impacted.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative) in the Final GMP/EIS, NPS would undertake further studies before finalizing a decision to locate USPP horses at this site. These studies would identify whether any clearing of vegetation would be required to locate stables and a paddock area, and would include additional environmental documentation and a survey for potential archaeological resources.

Issue 6.2.4.3: Provide for protection of Threatened and Endangered Species.

Representative Quote: Difficult Run has been designated as a Threatened and Endangered Species Water, due to the presence of wood turtles, which are listed by the Commonwealth as a threatened species. Other streams in the vicinity of the Park also support this species. Wood turtles are found primarily in and near clear brooks and streams in deciduous woodlands. Although highly terrestrial, they typically remain in moist areas. As with any long-lived and slow-reproducing species, the loss of a single wood turtle can have devastating effects on the species population. It is a violation of Virginia law, according to the Department of Game and Inland Fisheries, to harm a wood turtle or to keep it for personal possession. The Department of Game and Inland Fisheries recommends the following [Wood Turtle Conservation Measures]: [a] Provision of an undisturbed riparian buffer of at least 300 feet in width be restored and/or preserved along Difficult Run and other perennial streams that are known to support, or to have potential to support, wood turtle populations; [b] Provision of undisturbed buffers 100 feet wide along intermittent streams; [c] Incorporation of wood turtle conservation into the Park's environmental education programs, including use of appropriate signs to inform Park visitors about the wood turtle, including the status of wood turtle conservation and legal status in Virginia.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative), the NPS would prepare a TMP. The purpose of the TMP would be to ensure that

horseback riding, hiking, and mountain biking activities, as well as access to key areas for other activities such as climbing or interpretation, continue on designated trails in the park, but in a manner that is consistent with NPS's responsibility of protecting park resources. . An evaluation of sensitive natural and cultural resources (including threatened and endangered species) impacts resulting from trail activities will be conducted as part of the TMP.

Currently, the Difficult Run Trail runs parallel to Difficult Run and is located less than 100 feet from the stream. During preparation of the TMP, the NPS would examine the impacts of the trail, and its use for hiking, biking, and horseback riding, on wood turtles. If impacts are determined, the NPS would explore options for minimizing impacts, including rerouting the trail if necessary.

Issue 6.2.4.4: Impacts of flooding on natural resources.

Representative Quote: In the FEIS, include an assessment of the impacts to natural resources, especially impacts to sensitive plant species, caused by annual flooding of the Potomac River. Contrast and quantify these impacts to those impacts thought to be caused by human activities.

Response: As described under Section 3.3.3 (Biological Resources), the Potomac River's periodic flooding is one of the primary contributing factors towards the biological diversity present in the Potomac Gorge. Areas that flood relatively frequently are dominated by riparian communities and species associated with floodplains; areas on higher elevations that flood relatively less frequently are dominated by terrace communities consisting of upland species; and, upland forest blocks are located in areas that rarely or never experience flooding. Therefore, periodic flooding generally benefits the existing natural resources in the park.

Impacts resulting from human activities will be discussed in the CMP that the NPS will prepare based on the ongoing study ("Assessment of Climbing Impacts on Cliff Habitat and Rare Plant Species at Great Falls Park, Virginia and C&O Canal National Historical Park, Maryland"). The study will include developing and applying objective methods for assessing trampling-related impacts from visitors along trails, at cliff-top and cliff-base vistas, at recreation sites, and from climbers on the cliff-face. If impacts to rare plants or rare plant communities are detected, they will be documented and investigated, and recreation management practices designed to avoid or minimize associated resource impacts will be identified.

RECREATIONAL ACTIVITIES - CLIMBING

Issue 6.2.4.5: Concerns with managing climbing activities in the park.

Representative Quote: I urge that the final GMP/EIS defer all specific decisions on whether anchors or permits should be included in a CMP to the CMP process itself.

Representative Quote: The following changes are needed to Alternative B: all current climbing areas shall be labeled "Designated Climbing Sites". The NPS and FOGF shall collaboratively study and jointly decide on the following issues and the concomitant details of how, what, where, when, etc. [regarding] access to Designated Climbing Sites, need for permanent anchors, [and] need for permits.

Representative Quote: Should a CMP be proposed in the revised GMP as part of Alternative B or an equivalent, it 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.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS, the NPS would continue to provide climbing opportunities in Great Falls Park and would prepare a CMP under Alternative B. The park will prepare the CMP as a collaborative effort with the public and the climbing community, with the intention of continuing climbing as a traditional visitor use, but in a manner that is consistent with NPS's responsibility of protecting park resources, as required by its Management Policies. In general, the CMP is anticipated to: (a) examine climbing routes on a case-by-case basis and recommend whether the climbing areas should be expanded, kept the same, or reduced; (b) examine access to the climbing areas from adjacent trails and, in areas where access is off undesignated trails, work with the public to develop strategies where access is maintained; (c) recommend best practices, especially in areas within or adjacent to sensitive resources. These practices could include the limited use of fixed anchors or an access pass for specific areas if necessary to avoid sensitive resources; and (d) potentially close specific areas on a temporary, periodic, or permanent basis, if necessary for resource protection.

NPS would also adopt temporary measures on a trial basis until the CMP is prepared. The park is concerned with potential impacts from foot traffic on the globally rare Central Appalachian/ Piedmont riverside prairie located between the southern end of Overlook #3 and the Sand Box climbing area. To avoid potential damage to this resource, the park would: (a) designate a trail to access Gorky Park, Microdome and Flat Iron climbing routes located in this area; (b) allow access to this area with an access pass; (c) formalize an existing undesignated trail used commonly by climbers as the only access route to the Sand Box climbing area; and (d) install a fence along the River Trail to preclude visitors from entering the area other than at the designated trail head.

Issue 6.2.4.6: Temporary closure of climbing areas.

Representative Quote: To the extent that any plants need temporary protection for re-growth, the NPS should work with climbing organizations to work on a plan that is precisely tailored to temporarily restrict climbing in certain specific locations and certain specific times. Climbers are responsible stewards of the environment and would respect any valid temporary and narrowly tailored action to avoid damage to specific, documented damage to natural resources.

Response: As described under Section 2.I.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS and above under Response to Issue 6.2.4.5, the park would implement the following measures on a trial basis. To address the park's concern with potential impacts from foot traffic on the globally rare Central Appalachian/Piedmont riverside prairie located between the southern end of Overlook #3 and the Sand Box climbing area: (a) the park would designate a trail to access three climbing routes (Gorky Park, Microdome and Flat Iron) located in this area; (b) climbers would be allowed to access this area with an access pass. The purpose of the pass would be to discourage casual visitors from entering this area, as well as for the park staff to provide visitors with educational information about appropriate recreational practices in the area. NPS anticipates that this access pass would be issued seasonally, in unlimited quantities, and free-of-charge; (c) the park would formalize an existing undesignated trail used commonly by climbers as the only access route to the Sand Box climbing area. Visitors seeking to access the Sand Box area would be required to enter and exit using the designated route; and (d) the park would install a fence along the River Trail to preclude visitors from entering the area other than at the designated trail head. In addition, the park would use signage to inform visitors that an access pass is required to use the trail, as well as identify the level of difficulty of the trail, and whether it was open for access due to river conditions.

Issue 6.2.4.7: Use of Trails.

Representative Quote: We believe that improved signage on trails and an improved trail system will eliminate any concerns that horses will damage the Park's historical assets. Our group is ready to meet with Park staff to devise appropriate solutions to any specific problems that the Park believes are created by horses.

Response: As described under Section 2.I.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS, the park would prepare a TMP as a collaborative effort with the public including, the local horseback riding, hiking, mountain biking, and rock climbing communities, as well as park neighbors. The purpose of the TMP would be to ensure that horseback riding, hiking and mountain biking activities, as well as access to key areas for other activities such as climbing or interpretation, continue on designated trails in the park, but in a manner that is consistent with NPS's responsibility of protecting park resources. An evaluation of sensitive natural and cultural resources impacts resulting from trail activities will be conducted as part of the TMP. Opportunities for horseback riding on designated trails would remain available; however, the park would consider redesigning, realigning, or closing portions or entire trails where the TMP identifies adverse impacts to a sensitive natural or cultural resource.

Issue 6.2.4.8: Use of anchors for climbing activities.

Representative Quote: The GMP/EIS also proposes the installation of permanent anchors. The reasons for this policy are not given, and there are no details as to how a permanent anchor scheme would operate. Questions: - What is the

principal rationale for anchors? Are anchors for protection of trees/other resources or for 'safety'? - What type of anchors? (Bolts, chains?) How many anchors, what spacing, what areas? - If bolts, would they be located at edge of cliff (safety concern) or back from edge? - Are climbers to be required to use the permanent anchors only - e.g. no use of anchors constructed with rock climbing hardware, and/or no use of trees (including protective wraps around trees)? - Will available routes be limited to one or two directly under the permanent anchors, with routes to the side not permitted, if anchors are not installed above all routes? - Would anchors be shared by different climbers? - Would commercial groups have preferential use of anchors? - Who takes responsibility for proper installation and maintenance of anchors?

Representative Quote: Am opposed to the use of artificial anchors to determine or regulate climbing areas or the number of climbers. Artificial anchors, if used at all, should be assessed on a case-by-case basis, and such evaluations should be made in conjunction with the NPS and representatives of the climbing community, such as the Friends of Great Falls.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS, the park will prepare a CMP as a collaborative effort with the public and the climbing community, to ensure that climbing continues in the park as a traditional visitor use, but in a manner that is consistent with the NPS's responsibility of protecting park resources. During the preparation of the CMP, the NPS will explore and recommend best practices, especially in areas within or adjacent to sensitive resources in the park. These practices could include the limited use of fixed anchors for specific areas if necessary to avoid sensitive resources.

Issue 6.2.4.9: Need for permits.

Representative Quote: The proposed GMP/EIS does not contain sufficient detail to fully evaluate the impact it could have on climbing at Great Falls. In particular, the proposal to require permits to climb at Great Falls is not spelled out in sufficient detail to provide the climbing community with the ability to determine how it will effect us.

Representative Quote: The GMP/EIS proposes that under the preferred alternative permits would be needed for rock climbing. In the GMP/EIS, the reasons for needing a permit system are not given, and there are no details as to how a permit system would operate. It is consequently difficult to comment on either the rationale or mechanics of a permit system. Questions - Are permits intended to simply reduce climber numbers, or is there a perceived safety aspect as well? - If there is a safety aspect, how will increased safety be implemented? What tests would be used to issue permits? Who would implement the tests? How often? Where? - If permits are intended for access control, i.e., as a quota, how would this quota be determined? Would permits be for a day or a shorter period? Would permits be for individual routes? Would permits be reissued during the day if someone leaves? - How will permits be issued/checked? Will

there be a fee, in addition to the usual entry charge? What resources does the NPS have to implementing a permit system, both administratively and in terms of enforcement? For example, would there be rangers at the top of the cliffs? - There seems to be the possibility of permit capture by commercial groups which will eliminate recreational access. Would commercial groups be included/excluded from any permitting system/quotas?

Representative Quote: Oppose permits for individuals, but support them for groups. In fact, I would like to see group permitting enforced more, as there are COUNTLESS times that I find groups at climbing sites during the summer who are not permitted. These groups (often church groups or community groups) have not reviewed the application procedures or documented that they have appropriate staff and safety protocols, yet they climb anyway.

Representative Quote: The GFCA is opposed to the permitting of any specific user group. Part of the challenge of this park is to balance the protection of natural and cultural resources with recreational opportunities. We suggest that special outreach materials be developed which would contain tips on good stewardship for each user group.

Representative Quote: How will permits protect sensitive plants? What is the purpose of permits? Is the idea that permits with a fee would discourage climbers from using Great Falls, and that fewer people would mean less damage to plants? If that is the case, has the NPS undertaken any studies to determine the relationship between the damage to these plants and the numbers of climbers? Is the idea that fee permits would compensate the NPS for relocating rare plants? If there will be no fee for permits, what effect are they intended to have? Has the Great Falls NPS consulted with any other national park areas on the use of permits? If so, what input did the Great Falls NPS receive?

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative) in the Final GMP/EIS, and above in response to Issue 6.2.4.5, the NPS will implement the following measures on a trial basis. To address the concern with potential impacts from foot traffic on the globally rare Central Appalachian/ Piedmont riverside prairie located between the southern end of Overlook #3 and the Sand Box climbing area, the park would designate a trail to access three climbing routes (Gorky Park, Microdome and Flat Iron) located in this area. Climbers would be allowed to access this area with an access pass. The purpose of the pass would be to discourage casual visitors from entering this area, as well as for the park staff to provide visitors with educational information about appropriate recreational practices in the area. NPS anticipates that this access pass would be issued seasonally, in unlimited quantities, and free-of-charge. The management of access to this area through an access pass would be implemented on a trial basis and would be reexamined during the preparation of the CMP.

Issue 6.2.4.10: Closure of climbing areas due to concerns with trail access.

Representative Quote: The NPS should, with the FOGF, reroute paths that are destructive in order to minimize impact. Both groups are responsible for creating and implementing a solution to the problem. It is not acceptable to simply restrict access to climbing areas by closing existing paths without creating a replacement.

Representative Quote: Cliff closures are an extreme measure. There are alternative access paths to Gorky Park, Microdome and the Flat Irons. A better approach would be to mark sensitive sites with designated climbing access paths. The Park Service can work with local clubs and the Friends of Great Falls to identify and mark these trails.

Response: As discussed under Section 2.1.2 (Alternative B - Preferred Alternative), the park is concerned with potential impacts from foot traffic on the globally rare Central Appalachian/ Piedmont riverside prairie located between the southern end of Overlook #3 and the Sand Box climbing area.

To avoid potential damage to this resource, the park would adopt several temporary measures until a CMP is prepared. These include the following:

- The park would designate a trail to access three climbing routes (Gorky Park, Microdome, and Flat Iron) located in this area.
- Visitors seeking to engage in climbing would be allowed into this area with an access pass. The purpose of the pass would be to discourage casual visitors from entering this area, as well as for the park staff to provide visitors with educational information about appropriate recreational practices in the area. NPS anticipates that this access pass would be issued seasonally, in unlimited quantities, and free-of-charge.
- The park would formalize an existing undesignated trail used commonly by climbers as the only access route to the Sand Box climbing area. Visitors seeking to access the Sand Box area would be required to enter and exit using the designated route.
- The park would install a fence along the River Trail to preclude visitors from entering the area other than at the designated trail head. In addition, the park would use signage to inform visitors that an 'access pass' is required to use the trail, as well as identify the level of difficulty of the trail, and whether it was open for access due to river conditions.

RECREATIONAL ACTIVITIES – HIKING / MOUNTAIN BIKING / HORSEBACK RIDING

Issue 6.2.4.11: Impact of trails on sensitive resources.

Representative Quote: The Plan may also propose to educate visitors through increased interpretive programs regarding benefits of preserving wetlands. EPA suggests that raised walkways be considered, where feasible, to prevent visitor impact to wetlands.

Representative Quote: We caution against any new activities, including trail development, along Difficult Run. Difficult Run has been designated a Threatened and Endangered Species Water due to the presence of State Threatened wood turtles.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative), the NPS would prepare a TMP. The purpose of the TMP would be to ensure that horseback riding, hiking and mountain biking activities, as well as access to key areas for other activities such as climbing or interpretation, continue on designated trails in the park, but in a manner that is consistent with NPS's responsibility of protecting park resources. An evaluation of sensitive natural and cultural resources impacts resulting from trail activities will be conducted as part of the TMP.

During preparation of the TMP, the NPS would examine the impacts of hiking, biking, and horseback riding along the Difficult Run Trail on wood turtles. If impacts are determined, the NPS would explore options, including rerouting the trail, or redesigning portions of it as a raised walkway to minimize impacts.

Also, as described under Section 2.1.2 (Alternative B – Preferred Alternative) of the Final GMP/EIS, interpretive programs in the park would be expanded and designed to enhance a visitor's experience and understanding of the cultural and natural features that contribute to the park's significance. These features include, amongst others, the presence of the park within the Potomac River watershed. Within this context, the park would explore adding information that highlights the benefits of preserving wetlands.

Issue 6.2.4.12: Consider realignment and reconstruction of horseback riding trails in sensitive areas instead of closing them.

Representative Quote: We also applaud the exploration of removal of horse trails, particularly around Mine Run. For many years, we have been concerned about the trampling of rare plants and their habitat along Mine Run near Clay Pond. We hope an agreement can be reached with the horseback-riding community that will result in alternative trails away from areas with sensitive natural and cultural resources.

Representative Quote: The proposed closure of the Mine Run and Matildaville trails are examples of trails that make a ride in the park unique and interesting to everyone (horsemen included). The primary users of the Matildaville Trail are walkers and joggers, not horseback riders. If other users are allowed to continue using it, and only riders are prohibited I think you will soon find that you still have the same environmental damage you now experience. I say this because the primary ingredient to the problem is that the trail has little or no drainage in certain key areas. Its continued use by the non-riding public will still result in erosion and damage to the environment. What might enable this trail to remain viable for all groups would be the establishment of a "raised bed" in those key areas that tend to become a bog after the heavy rains of Spring or Fall. When I say

raised bed, I have in mind something like what gardeners do when they build a "raised flower bed". Specifically! This would be a path that has pressure-treated boards on each side that retain a stone and crushed stone base covered by several inches of stone dust on top. This will raise the elevation of the path anywhere from 6 to as much as 12 inches above the surrounding soil in these difficult areas. This technique has worked well in other applications and should provide a good firm dry surface for all users. It would only need to be employed in those low lying areas of the trail where adequate drainage is not naturally available.

Representative Quote: (There is no) credible evidence that wear on the trails from horse travel in particular contributes to the disturbance of relics that are still buried, or to sensitive vegetation. If there is any concern about wear and tear from traffic in general, this should be addressed by realigning those sensitive parts of the trail for all traffic, rather than singling out equestrians as unwelcome users.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative), the park would prepare a TMP, in partnership with the public including the local horseback riding, hiking, mountain biking, and rock climbing communities, as well as park neighbors. The purpose of the TMP would be to ensure that horseback riding, hiking and mountain biking activities, as well as access to key areas for other activities such as climbing or interpretation, continue on designated trails in the park, but in a manner that is consistent with NPS's responsibility of protecting park resources. An evaluation of sensitive natural and cultural resources impacts, including the area adjacent to Mine Run and Clay Pond, resulting from trail activities will be conducted as part of the TMP. Based on the study, the TMP would recommend whether the designated trail system should be expanded, realigned, kept the same, or closed in segments where resource impacts are identified. The TMP would also recommend best practices, especially in areas where trails are located within or adjacent to sensitive resources, such as near Mine Run or Clay Pond. Such practices could include requiring an access pass for specific areas or uses if necessary, fencing off areas to avoid sensitive resources, or reconstructing portions of the trail using techniques such as boardwalks to minimize impacts.

Issue 6.2.4.13: Criteria for determining closure of routes.

Representative Quote: There is no stated mechanism for developing clear criteria/decision process for closing certain climbing areas.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative), the NPS will prepare a CMP. The CMP will be prepared in partnership with the public and the climbing community, and would be aimed to ensure that climbing continues in the park as a traditional visitor use, but in a manner that is consistent with NPS's responsibility of protecting park resources. NPS has recently initiated a study to assess the impacts that climbing may have on cliff habitat and rare plant species. This study would provide an assessment of impacts related to climbing. The CMP would be based on the information gathered for this study and would

determine appropriate strategies to manage climbing activities. In general, the CMP could recommend potentially closing specific areas on a temporary, periodic, or permanent basis, if necessary for resource protection. The CMP would also describe the process that would be undertaken if such closure is recommended.

Issue 6.2.4.14: Connections with regional trails.

Representative Quote: The Northern Virginia Regional Commission staff has reviewed the application described above. Staff would like to note that the existing system of formal and social trails currently serves to provide park access for wide range of users. For example, a social trail provides an important link between the Fairfax County Stream Valley equestrian/hiking trail along Difficult Run and the Ridge Trail, making possible a circuit hike that includes the scenic Difficult Run Trail in Great Falls Park. Staff recommends that the General Management Plan ensure that the internal trail system components of the plan coincide with existing and future plans for the Fairfax County trail network. In addition, the plan should provide for collaboration and cooperation with local government officials to identify a suitable alignment for the Potomac Scenic National Heritage Trail.

Response: As described under Section 2.1.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS, the proposed Cross County Trail (CCT), Potomac Heritage National Scenic Trail (PHNST), and the Georgetown Pike Trail (GPT) would be connected to existing trails within the park. These existing trails within the park would be identified by their original names, as well as the name(s) of the regional trails that would connect to them. For example, the existing Difficult Run trail within the park would also be named the CCT to indicate that the trail functions both as the Difficult Run Trail and as a route for the CCT. Potential routes for the regional trails through the park are illustrated in Figure 2.2 on page 2.14 of the FEIS.

During the preparation of the TMP, the NPS would coordinate with Fairfax County to identify a preferred route for the PHNST.

Issue 6.2.4.15: Adoption of a temporary trail closure policy in response to weather conditions.

Representative Quote: A good bit of erosion occurred in June/July when we had the heavy rains. Many of the main trails have major gullies as a result of the rain - this is not as the result of horses or bikes. It may be better to institute a policy that says no bike or horseback riding within X number of days after a rain. I know that gets difficult to determine, but I think the horse community would be more than willing to go along with more a flexible policy then having to get permits.

Representative Quote: (There is no) credible evidence that wear on the trails from horse travel in particular contributes to the disturbance of relics that are still buried, or to sensitive vegetation. If there is any concern about wear and tear

from traffic in general, this should be addressed by realigning those sensitive parts of the trail for all traffic, rather than singling out equestrians as unwelcome users.

Response: At this time, no permits or access passes are recommended for horseback riding. However, as described under Section 2.1.2 (Alternative B - Preferred Alternative) of the Final GMP/EIS, the NPS will prepare a Trail Management Plan (TMP), the purpose of which would be to ensure that horseback riding, hiking and mountain biking activities continue on designated trails in the park, but in a manner that is consistent with NPS's responsibility of protecting park resources.

An evaluation of sensitive natural and cultural resources impacts resulting from trail activities will be conducted as part of the TMP. Based on the impacts that are identified by the study, the park would explore measures including closing specific trails on a temporary, periodic, or permanent basis, if necessary for resource protection. The TMP would also recommend best practices, especially in areas where trails are located within or adjacent to sensitive resources. Such practices could include requiring an access pass for specific areas or uses if necessary on a temporary or permanent basis, or fencing off areas to avoid sensitive resources. The park will prepare the TMP with input from the public including the local horseback riding community.

Issue 6.2.4.16: Consider closure of undesigned (social) trails on a case-by-case basis.

Representative Quote: *The trail runs from Riverbend Road, at a point about 1000 feet from its intersection with Georgetown Pike and joins the Ridge Trail near Old Dominion Drive. I believe the route of the trail was originally called "The Old Country Road". The trail is clearly shown on the large map posted in the museum section upstairs in the building at Great Falls Park. Currently, hikers and riders walk alongside the old roadbed. A copy of a photo taken of the map is attached with the trail circled. The trail is not shown in the Draft General Management Plan on page 3-9 (figure 3-2), which shows existing trails. As the trail is at least as old, if not older, than any of the trails shown, I point out this omission since it is clearly shown on your own museum map. If the Interior Department closes this historic trail into the park, it would mean that equestrians and hikers alike would have no way of accessing the park from my property, nor, for that matter, from any other location north of Georgetown Pike. Equestrians, in particular, would have to load their horses onto trailers and drive them to the park. This makes no sense from an overall environmental point of view and would tie up a lot of parking spaces at the park. It is hard to see how this would serve any positive environmental purpose.*

Representative Quote: *Existing trails, social trails too, need to remain in service. As visitors increase in number we need to spread them out rather than concentrating them on fewer trails.*

Representative Quote: *I feel that closure or development of social trails should be on a case-by case basis. Some social trails may benefit the park by being*

designated and maintained. Development of trails may include the reduction of impacts to vegetation, the wildlife habitat, and water resources.

Response: In accordance with the recommendations in the Final GMP/EIS, the park would eliminate some of the existing undesigned (social) trails to reduce habitat fragmentation, and to protect sensitive resources. As described under Section 2.1.2 (Alternative B - Preferred Alternative), the NPS would prepare a TMP to ensure that horseback riding, hiking and mountain biking activities, as well as access to key areas for other activities such as climbing or interpretation, continue on designated trails in the park, but in a manner that is consistent with NPS's responsibility of protecting park resources. The TMP would focus on reducing the number of undesigned trails in the park, and adopting practices to avoid the creation of new undesigned trails. During the preparation of the TMP, the park will examine the designated and undesigned trails on a case-by-case basis to determine their impacts on sensitive natural and cultural resources and identify which trails should be eliminated, relocated, or left as is. The TMP would designate those existing undesigned trails, that provide access to key areas without impacting sensitive resources.

Issue 6.2.4.17: Horses and bikes access to the Potomac Heritage National Scenic Trail.

Representative Quote: Mountain bikers and equestrians use the carriage roads that link Great Falls to other areas. We believe the new management plan needs to implicitly state that the Potomac National Heritage Trail be designated as bike and horse "friendly" ensuring these users will be able to traverse this section of the heritage trail, even following reroutes and fortifications of the canal zone.

Response: The proposed PHNST would be connected to existing trails within the park. The potential route for the trail through the park is illustrated on Figure 2.2 on page 2.14 of the Final GMP/EIS. As proposed, the PHNST would overlap with the Difficult Run Trail, Ridge Trail, and the Old Carriage Road Trail, all of which currently allow access for mountain biking and horseback riding.

Issue 6.2.4.18: Consideration of a separate bike and hiking lane along the entrance road.

Representative Quote: Concerning general trails, the NPS should strive to connect trails with trails outside the park so that enhanced hiking and biking opportunities would be available. Bicycle and hiking access to the park should be encouraged to help alleviate traffic and parking problems. Currently, it is quite difficult to get into the park by bicycle. A separate bike lane and hiking trail should be added to the entrance road as well as adding access from other nearby parks.

Response: As described under Section 2.4.7 (Construct a New Trail Parallel to Old Dominion Drive and Georgetown Pike), the park had explored the option of constructing a bicycle/pedestrian trail parallel to the entrance road. One of the reasons for eliminating this option from further consideration was the potential impacts of such a trail on the park's natural resources. Preliminary analysis

conducted indicated that a proposed trail along Old Dominion Drive (between Georgetown Pike and the entrance station) would be approximately 4,700 feet long, of which approximately 600 feet would be in the form of a boardwalk. Assuming that this trail would be eight feet wide, parallel on the east side of Old Dominion Drive, and built for the use of bikes and pedestrians (since horses would not use the boardwalk portion), it has the potential to result in the following impacts:

- Require the removal of 37,600 SF of vegetation (4,700 feet x 8 feet). A considerable amount of trees along Old Dominion Drive would need to be removed to establish this trail.
- Approximately 75 percent of this trail would be on land with more than 12 percent slope

Issue 6.2.4.19: Restriction of pets to specific areas of the park.

Representative Quote: Pets should be limited to particular areas, or kept away from specified areas. The Department of Conservation and Recreation recommends measures such as a leash law and restrictions intended to avoid user conflicts.

Response: NPS regulations require pets to be on leash in all national parks (36 CFR Section 2.15). In addition, dogs are required to be on leash in all public areas of Virginia (except dog parks). This information is posted near the entrance station, bulletin board, and park information cards that are given out to the visitors.

RECREATION – BOATING

Issue 6.2.4.20: Access to the Potomac River

Representative Quote: The Department of Conservation and Recreation recommends portage opportunities for kayak and canoe users.

Response: As described under Section 2.1.2 (Alternative B – Preferred Alternative), access to the Potomac River for whitewater boating and kayaking would remain available from Fisherman’s Eddy (located between Overlooks 2 and 3), and AA Gorge.

6.2.5 Funding for Improvements

Issue 6.2.5.1: Funding for trail improvements.

Representative Quote: We urge that the park staff explore the possibility of getting additional funding for River Bend Road and the Georgetown Pike Trails by working with Great Falls Trail Blazers as they pursue funding for local trails.

Response: The park is very interested in obtaining additional funding for Riverbend Road and Georgetown Pike Trails and would be interested in coordinating application

for funding with the Trail Blazers. The Trail Blazers should contact the Site Manager to coordinate this effort.

6.2.6 Community Involvement

Issue 6.2.6.1: Collaboration with community and local organizations to develop the Climbing Management Plan and the Trails Management Plan.

Representative Quote: Great Falls Park is heavily utilized by climbers, equestrians, hikers, boaters, and others. Many of these users are conservation-minded and would like to see the Park's natural areas protected while preserving access to recreational resourcesPerhaps through education and partnership, a plan can be developed that would reduce impact to sensitive plant species, while retaining adequate access to popular climbing locations. We urge you to consider holding public discussion forums focused on various user groups to encourage education about sensitive resources and an open discussion about how to protect these resources.

Representative Quote: Policy decisions concerning rock climbing should not be made unilaterally by the NPS. Instead such policies should be developed through consensus between the NPS and the rock climbing community.

Representative Quote: Commission staff recommends that the Plan be developed to: ensure that the internal trail system components in the Park coincide with existing and future plans for the Fairfax County trail network; and provide for collaboration and cooperation with local government officials to identify a suitable alignment for the Potomac Scenic National Heritage Trail.

Response: To continue engaging the public in its decision-making, the NPS would routinely conduct meetings, publish newsletters, and post updates on its website, under either alternative. These meetings, newsletters, and web postings would provide an update on actions recommended in the Final GMP/EIS and would be utilized to solicit individual opinions on specific issues.

The Federal Advisory Committee Act (FACA) provides agencies with guidelines on seeking public input. Consistent with the FACA guidelines, the NPS will meet with individuals and groups or organizations involved in rock climbing to obtain input during the development of the CMP under Alternative B. Similarly, NPS will meet with individuals and groups, including park neighbors, during the development of the TMP under Alternative B.

6.3 COMMENTS FROM PUBLIC AGENCIES AND COMMUNITY ORGANIZATIONS

The following pages provide copies of correspondence received from public agencies and community organizations in response to the Draft GMP/EIS.



COMMONWEALTH of VIRGINIA

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

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October 12, 2005

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

RE: Draft Environmental Impact Statement and General Management Plan for
Great Falls Park
DEQ-05-222F

Dear Ms. Calhoun:

The Commonwealth of Virginia has completed its review of the above-listed Draft Environmental Impact Statement and General Management Plan ("Draft EIS/Plan"). The Department of Environmental Quality ("DEQ") is responsible for coordinating Virginia's review of federal environmental documents filed pursuant to the National Environmental Policy Act ("NEPA") and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also the lead agency for coordination of Virginia's review of federal consistency determinations prepared by federal agencies pursuant to the Coastal Zone Management Act ("CZMA"). The following agencies, regional planning district commission, and locality took part in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Agriculture and Consumer Services
Department of Conservation and Recreation
Northern Virginia Regional Commission
Fairfax County.

In addition, the Department of Historic Resources was invited to comment.

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Description of Action

The National Park Service ("Park Service") has prepared a General Management Plan and a Draft Environmental Impact Statement for Great Falls Park, a unit of the George Washington Memorial Parkway which is situated along the Potomac River northwest of Washington. The Plan is to guide management actions over the next 15 to 20 years in the Park. The Park Service, according to the Plan, proposes to rehabilitate the visitor center, converting it into an operations center. Under the Plan, the Park Service would also establish an education component on resource protection; provide a trail management plan and a climbing management plan, both of which would reduce potential damage to sensitive cultural and natural resources; and construct a new maintenance building and police trailer (Draft EIS/Plan, page 2.6, section 2.1.3; see also Federal Register, Volume 70, Number 156, dated August 15, 2005, page 47853). The no-action alternative is also analyzed (Draft EIS/Plan, pages 2.3 and 2.4, section 2.1.2).

Environmental Impacts and Mitigation

The Commonwealth supports the Preferred Alternative (enclosed comments from the Department of Game and Inland Fisheries and the Department of Conservation and Recreation). We have a number of recommendations relating to the Draft EIS/Plan and to the implementation of the Plan itself.

1. *Natural Heritage Resources.* "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered species of plants and animals, unique or exemplary natural communities, and significant geologic formations.

(a) *Recommendations for Resource Protection.* The Draft EIS/Plan indicates that the Park Service would, for either alternative Plan, close public access to the Potomac River from the shoreline adjacent to the northern tip of the Flake to the northern tip of the Sand Box climbing area (page 4.3, section 4.1.1, "Visitation and Visitor Activities" heading). The Department of Conservation and Recreation recommends that the entire high bedrock terrace, located south of the overlooks and adjacent to the south end of the picnic area, be closed to public access. This area has no direct river access; accordingly, it is less trampled than many other terrace areas and supports truly outstanding examples of riverside prairie and riverside outcrop barrens communities. Access should be permitted for scientific research and educational field trips.

With regard to the enhancement of emergency access at Sandy Landing (Draft EIS/Plan, page 4.5, section 4.1.4), the Department of Conservation and

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Recreation indicates that two significant biological communities and two rare plant populations about the existing access road on the north side. The Bedrock Terrace Oak-Hickory Forest at this location, when investigated in summer 2003 and spring 2004 (Fleming/Elis, 10/12/05), contained 126 species in a 400-square meter plot, representing the most species-rich vegetation ever recorded in Virginia (in more than 3,500 plots statewide) by the Department of Conservation and Recreation's Natural Heritage Program (Division of Natural Heritage). For this reason, any enhancement to this access should be designed to completely avoid affecting these biological elements.

(b) *Preparing the Climbing Management Plan.* With regard to preparing a climbing management plan (Draft EIS/Plan, page 4.17, section 4.3.3, "Rare, Threatened, and Endangered Species" heading), the Department of Conservation and Recreation recommends that the Park Service engage the climbing community in plan preparation. Similar plans for other National Park units (notably the Blue Ridge Parkway) have shown that early involvement of climbing constituents in the development of plans, combined with environmental education about the important cliff resources, led to greater protection of resources while allowing climbers access to desirable areas and reducing adversarial outcomes.

2. *Wildlife Resources.* The Department of Game and Inland Fisheries, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects. The Department (hereinafter "DGIF") is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 et seq.), and provides environmental analysis of projects or permit applications coordinated through the Department of Environmental Quality and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

(a) *General Recommendation.* The Department of Game and Inland Fisheries strongly urges the expansion of the Park, through either direct purchase or the use of conservation easements, in order to aid in the conservation of all wildlife.

(b) *Trails.* DGIF encourages the proper management of trails in order to discourage new "social trails" and reduce the potential for damage to sensitive resources. (However, see item 8(b) below, relating to existing "social trails.")

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(c) *Wood Turtles.* Difficult Run has been designated as a Threatened and Endangered Species Water, due to the presence of wood turtles, which are listed by the Commonwealth as a threatened species. Other streams in the vicinity of the Park also support this species.

Wood turtles are found primarily in and near clear brooks and streams in deciduous woodlands. Although highly terrestrial, they typically remain in moist areas. As with any long-lived and slow-reproducing species, the loss of a single wood turtle can have devastating effects on the species population.

It is a violation of Virginia law, according to the Department of Game and Inland Fisheries, to harm a wood turtle or to keep it for personal possession.

(d) *Wood Turtle Conservation Measures.* The Department of Game and Inland Fisheries recommends the following:

- Provision of an undisturbed riparian buffer of at least 300 feet in width be restored and/or preserved along Difficult Run and other perennial streams that are known to support, or to have potential to support, wood turtle populations;
- Provision of undisturbed buffers 100 feet wide along intermittent streams;
- Incorporation of wood turtle conservation into the Park's environmental education programs, including use of appropriate signs to inform Park visitors about the wood turtle, including the status of wood turtle conservation and legal status in Virginia.

(e) *Additional Information.* More information about wood turtles can be found at the following web site:

- <http://www.dgif.virginia.gov/wildlife/species/display.asp?id=030062>.

3. *Air Quality.* According to DEQ's Division of Air Program Coordination, the Park is in an ozone non-attainment area. Accordingly, the Park Service should, in implementing activities pursuant to the Plan, take all reasonable precautions to limit the emissions of oxides of nitrogen (NOx) and volatile organic compounds (VOCs), which are the precursors to atmospheric ozone. The following guidance applies to construction or other activities contemplated in the Plan.

(a) *Fugitive Dust Control.* During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the

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Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(b) *Open Burning.* If project activities include the burning of construction or demolition material or land-clearing debris, this activity must meet the requirements under 9 VAC 5-40-5600 et seq. of the Regulations for open burning, and it may require a permit (see "Regulatory and Coordination Needs," item 1, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Park Service should contact Fairfax County officials to determine what local requirements, if any, exist. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town, or built-up area.

(c) *Fuel-burning Equipment.* Fuel-burning equipment may require an air pollution control permit, depending on its capacities and its potential to emit air pollutants. See "Regulatory and Coordination Needs," item 1, below.

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4. *Water Quality and Wetlands.*

(a) *The Document.* The Draft EIS/Plan indicates that wetland impacts are not anticipated (Draft EIS, page 4.15, section 4.3.3). DEQ's Northern Virginia Regional Office indicates that the Draft EIS/Plan did not discuss stream impacts.

(b) *Wetlands.* The wetlands were located based on a review of the National Wetland Inventory (NWI) maps for the Park. NWI maps do not represent the legal boundaries of stream channels and wetlands, and these maps are often significantly inaccurate. Actual boundaries of streams and wetlands regulated by the Virginia Water Protection Permit Program are determined by a wetland delineation that is confirmed by the Army Corps of Engineers.

Accordingly, in the event that physical activities are undertaken pursuant to the Plan (i.e., a new trail), DEQ recommends that the Park Service conduct a wetland delineation of the proposed project area to determine the presence of streams and/or wetlands. If project activities are proposed that will affect these resources, a Virginia Water Protection Permit will be required. See "Regulatory and Coordination Needs," item 2, below.

Any project must demonstrate compliance with section 404 (b)(1) guidelines of the Clean Water Act and with the Commonwealth's wetlands mitigation policies. Both federal and State guidelines recommend avoidance and minimization of wetlands impacts as the first steps in the mitigation process.

5. *Solid and Hazardous Waste Management.* According to DEQ's Waste Division, solid waste issues and sites were addressed in the Draft EIS/Plan; hazardous waste issues and sites were not addressed. The Draft EIS/Plan did not include a search of DEQ's waste-related data bases.

(a) *Waste Division Findings.* DEQ's Waste Division conducted a cursory review of its data files and did not identify any waste sites that would affect or be affected by Plan activities.

(b) *Contamination.* Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (Virginia Code sections 10.1-1400 et seq.), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60), and the Virginia Solid Waste Management Regulations (9 VAC 20-80). (See the enclosed DEQ memo, Brockman to Ellis, dated September 21, 2005 for additional citations.)

Ms. Audrey F. Calhoun
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(c) *Demolition of Structures.* The existing structure should be checked for asbestos-containing materials and lead-based paint prior to its demolition. If asbestos-containing materials are found, the Park Service must follow the requirements of the Solid Waste Management Regulations (9 VAC 20-80-640) as well as federal regulations (see the memo referenced above). If lead-based paints are found, the Park Service must follow the requirements of the Hazardous Waste Management Regulations (9 VAC 20-60-261) in addition to other applicable requirements.

(d) *Pollution Prevention.* DEQ encourages the Park Service to follow pollution prevention principles in all construction projects. These principles include reduction of waste materials at the source, re-use of materials, and recycling of waste materials to the greatest extent practicable.

6. *Chesapeake Bay Preservation Areas.* According to the Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance, the Plan appears consistent with the Chesapeake Bay Preservation Act (*Virginia Code* sections 10.1-2100 et seq.) and the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.), in that there are proposed improvements to eroding areas, and trails in sensitive areas are being limited (see, for example, the charts on pages 2.11 and 2.12 of the Draft EIS/Plan). However, the Draft EIS/Plan does not specifically address concerns with respect to the Chesapeake Bay Preservation Act (*Virginia Code* sections 10.1-2100 et seq.) and the document incorrectly identifies Chesapeake Bay Preservation Areas (page 3-28, section 3.3.2, "Watersheds and Resource Protection Areas" heading). Chesapeake Bay Preservation Areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs), as defined pursuant to the Act and the Regulations cited above.

(a) *Resource Protection Areas; Guidance.* RPAs include the following features:

- tidal shores
- tidal wetlands
- non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or water bodies with perennial flow; and
- a 100-foot buffer located landward of the above features.

Passive recreation facilities such as boardwalks, trails, and pathways are conditionally exempt in RPAs, provided that for any land disturbance of 2,500 square feet or more, the project complies with the requirements of the *Virginia Erosion and Sediment Control Handbook*. In addition, stormwater management

Ms. Audrey F. Calhoun
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criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations* (4 VAC 3-20-71) must be satisfied.

Fairfax County notes that the proposed visitor center would be co-located with the existing maintenance facility, which is in the Potomac River's 100-year floodplain (pages 4.15 and 4.16, section 4.3.3). These facilities are in an area designated by the County as a Resource Protection Area; the area is already disturbed, with significant impervious surfaces on it. Under Fairfax County's Chesapeake Bay Preservation Ordinance, re-development is an allowed use in an RPA, provided that the area of impervious surface is not increased in order to construct the new facility.

(b) *Resource Management Areas; Guidance.* In Fairfax County, all areas which do not meet the RPA definition are RMAs. RMAs include land types that, if improperly used or developed, have a potential for causing significant water quality degradation or for diminishing the functional values of the RPAs. Activities in Resource Management Areas are subject to the general performance criteria in the Chesapeake Bay Preservation Area Designation and Management Regulations cited above (see 9 VAC 10-20-120); these include minimizing land disturbance, preserving indigenous vegetation, and minimizing impervious surfaces.

7. *Outdoor Recreation Recommendations.*

(a) *Department of Conservation and Recreation.* The Department of Conservation and Recreation recommends that the Park Service consider the following in preparing the Final EIS and Plan:

- The Park should have stronger connections, from physical and interpretive standpoints, with the Potomac River Water Trail. The Department of Conservation and Recreation also recommends portage opportunities for kayak and canoe users.
- Maintaining river access, especially as it relates to the Chesapeake Bay Tributary Trails, Gateways Program, and the Potomac River Trail, is of utmost importance to the Plan.
- Pets should be limited to particular areas, or kept away from specified areas. The Department of Conservation and Recreation recommends measures such as a leash law and restrictions intended to avoid user conflicts.

Ms. Audrey F. Calhoun
Page 9

- The Park Service should consider the connection between the Park and State Route 193, a scenic byway, and the impacts thereon of Park access.

(b) *Northern Virginia Regional Commission.* The Northern Virginia Regional Commission notes that the existing system of formal and "social" trails serves to provide park access for a wide range of users. For example, a social trail links the Fairfax County Stream Valley equestrian/hiking trail along Difficult Run and the Ridge Trail, making possible a circuit hike that includes the scenic Difficult Run Trail in the Park. Commission staff recommends that the Plan be developed to:

- ensure that the internal trail system components in the Park coincide with existing and future plans for the Fairfax County trail network; and
- provide for collaboration and cooperation with local government officials to identify a suitable alignment for the Potomac Scenic National Heritage Trail.

(c) *Fairfax County Trails.* The County indicates that the Fairfax County Trails Plan contemplates several trail courses and features, and recommends that the trails portrayed in the Plan/EA (see Figures 2.1 (page 2.5), 2.2 (page 2.7), and 2.3 (page 2.19) be made consistent with those in the County Trails Plan. The County Trails Plan includes:

- The Potomac Heritage National Scenic Trail, which veers north near the point where it enters the Park site in the southern corner and then generally follows the property line, crosses Difficult Run, and connects to Ridge Trail inside the Park;
- The Georgetown Pike Trail, envisioned as an 8-foot-wide stone dust trail, follows Georgetown Pike and runs northwesterly;
- Another 8-foot-wide stone dust trail follows River Bend Road on the Park side of the boundary;
- The Cross-County Trail coincides with the Difficult Run Stream Valley Trail.
- On-road bike lanes are planned along Old Dominion Drive, Georgetown Pike, and River Bend Road.

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(d) *Georgetown Pike Trail.* The proposed Georgetown Pike Trail is located along the Georgetown Pike frontage, very close to the Park, according to Fairfax County. The County believes that the Trail should be located generally within the State's right-of-way. Where state right-of-way is not available, the County does not know whether the Park would provide an easement for trail construction. It may be beneficial for this Trail to be incorporated into the Park's trail system.

8. *Local and Regional Comments.* The Northern Virginia Regional Commission's recommendations relate to recreation issues and are reflected in item 8(b), above.

Fairfax County applauds the Park Service in its efforts to balance recreational opportunities with the protection of natural and cultural resources in Great Falls Park. In the event Alternative B, the Preferred Alternative, is chosen, then the County encourages the Park Service to continue working with the recreational and scientific communities in developing trail and climbing management plans in ways that would maintain or further the balance of recreation and resource protection.

Fairfax County's other concerns are reflected in items 7(a), 8(c), and 8(d), above. Fairfax County Park Authority staff may provide separate comments, according to the County. (See "Regulatory and Coordination Needs, item 4, below.")

The Document

The Department of Conservation and Recreation (DCR) offers several recommendations concerning the Draft EIS/Plan document itself, and hopes these will also be reflected in the Final EIS and Plan. (See "Regulatory and Coordination Needs," item 3, below).

1. *Connection with Route 193 Scenic Byway.* DCR recommends that the Final EIS address the connection between Route 193 and Park roads, and consider impacts to Route 193 from Park traffic (see also "Environmental Impacts and Mitigation," item 7(a), above).

2. *Pages 1.15 and 1.16, section 1.5.* The following sentence is very awkward:

Some of these resources, including portions of the Potomac Gorge, presence of rare plant and biological species and its location within the Potomac River watershed, are critical to maintaining the significance and character of the Park.

Ms. Audrey F. Calhoun
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DCR suggests the following revision:

Some of these resources, including a section of the Potomac Gorge, the presence of rare plants, animals, and biological communities, and the Park's location within the Potomac River watershed, are critical to maintaining the significance and character of the Park.

3. Page 2.15, section 2.3.2, "Resource Condition or Character" heading. Nowhere in this document is the impact and management of invasive introduced species adequately addressed. Currently, the natural vegetation over much of Great Falls Park is being overrun by invasive exotic plants, including, but not limited to, the following (there are many others):

Japanese still-grass (*Microstegium vimineum*)
Chinese wisteria (*Wisteria sinensis*)
garlic-mustard (*Alliaria petiolata*)
Japanese honeysuckle (*Lonicera japonica*)
bush-honeysuckle (*Lonicera maackii*)
vinca (*Vinca minor*)

The spread of these exotics is often compounded by other activities, including excessive herbivory (consumption as food) of native species by white-tailed deer, horseback riding, disturbance of soils by visitors, and Park management and construction activities. Managing invasive species will be absolutely critical to "preserving ... natural resources and settings." Without a commitment to such management, the viability of many natural communities in the Park will be heavily compromised in the near future. Although a cooperative project with The Nature Conservancy for spot control of invasives in critical areas is currently underway, much more will be needed in the future. If this is not the correct place in the document to address this issue, it should be adequately discussed in an appropriate section of the document.

4. Page 3.32, section 3.3.3, "Vegetation" heading. Add the following paragraph to the vegetation discussion:

Finally, the frequently flood-scoured channel shelf of the river above the falls contains good examples of the Piedmont/Mountain Low Herb Sand Bar/River Shore, Water-Willow Rocky Bar and Shore, Sycamore-River Birch River-Scour Woodland, and Mixed Bedrock Floodplain River-Scour Woodland communities. While these have not yet been formally ranked by Natural Heritage ecologists, at least two of them are likely to be rare throughout their total range (globally rare) and as well as within their state range (state rare) (G. Fleming, VANHP, pers. comm.).

In addition, the citation for footnote 32 should read:

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Fleming, G.P., P.P. Coulling, K.D. Patterson, and K. Taverna. 2005. The natural communities of Virginia: classification of ecological community groups. Second approximation. Version 2.1. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond, Virginia (web site <http://www.dcr.virginia.gov/dnh/ncintro.htm>).

5. Pages 3.33-3.34, section 3.3.3, "Sensitive Plant Species" heading. Additional inventory work, changes in ranks, and changes in nomenclature since 1994 have combined to make this section somewhat out-of-date and inaccurate. DCR has taken the liberty of rewriting most of it to incorporate these changes and make it current as of September 2005. Ranks follow the Townsend (2004) document cited earlier in the "Vegetation" section. Note also that several misspellings have been corrected.

Relatively recently, record searches and field surveys were performed to identify sensitive plant species present at Great Falls National Park. From October 1992 through September 1993, research was conducted by Cris Fleming to identify and locate rare plant species at the park.³⁴ From October 1993 to October 1994, Fleming conducted research to identify and locate watch list and uncommon plant species present at the park.³⁷ From late 2002 through 2004, VANHP ecologist Gary Fleming documented additional rare species occurrences while conducting an intensive study of the park's vegetation ecology. VANHP botanist John F. Townsend and NPS botanist Brent Steury also documented rare plant populations during the past several years. The areas of sensitive vegetation habitat identified in Cris Fleming's reports, as well as the more recent fieldwork, correspond to several of the conservation targets specified in The Nature Conservancy's conservation plan.

Riparian communities occur along the Potomac River at elevations that flood relatively frequently and are dominated by species associated with floodplains (see Figure 3.6). Riparian communities are subject to stress by At Great Falls Park, the sandy/gravelly shores and bedrock floodplain north of the falls provides habitat for rare species including *Spartina pectinata* (G5S2), *Eleocharis compressa* (G4S2), *Solidago racemosa* (G5T3?S1), *Desmodium cuspidatum* var. *cuspidatum* (G5T5?S2), and *Hemicarpha micrantha* (G5S1). The floodplain forest above the falls contains the rare species *Hasteola suaveolens* (G3G4S2), *Erythronium albidum* (G5S2), *Maianthemum stellatum* (G5S2?), and a large colony of *Valeriana pauciflora* (G4S2). Watch list species identified in riparian communities at the park include *Baptisia australis*, *Cardamine douglasii*, *Carex conjuncta*, *Carex hirtifolia*, *Erigeron bulbosa*, and *Floerkea proserpinacoides*.

Terrace communities include bedrock terrace, outcrop, and cliff areas located at higher elevations along the Potomac River that are flooded less frequently than riparian areas and are dominated by upland species At Great Falls Park, the greatest concentration of rare plants occurs south of the falls in terrace communities. The globally rare *Amelanchier nantuckensis* (G3QS1), as well as

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the state-rare species *Carex straminea* (G5S1), *Cerastium arvense* ssp. *velutinum* (G4T4?S2?), *Eleocharis compressa* (G4S2), *Helianthus occidentalis* (G5S1), and *Solidago racemosa* (G5T3?S1) occur in the bedrock terrace area. Another globally rare plant, *Sida hermaphrodita* (G2G3S1), was recorded in a gully of the bedrock terrace in 1979 but has not been seen recently. The rocky bluffs and sandy coves area supports the rare species *Hasteola suaveolens* (G3G4S2), *Solidago rupestris* (G4?S1), *Solidago racemosa* (G5T3?S1), *Rhododendron arborescens* (G4G5S2), *Helianthus occidentalis* (G5S1), and *Cerastium arvense* ssp. *velutinum* (G5T4?S2?). Within the Terrace Forest area near Sandy Landing, the rare *Arabis shortii* (G5S2) and *Onosmodium virginianum* (G4S2) are found. The only known Virginia population of *Carex davisi* (G4S1) was recently found by Brent Steury in a disturbed area of the Terrace near Matildaville. Watchlist species identified in terrace communities at the park include *Baptisia australis*, *Cornus amomum* ssp. *obliqua*, *Juglans chinerea*, and *Packera paupercula*. Regionally uncommon species found in the riparian and terrace communities at the Park include

6. Page 3.38, section 3.3.3, "Invertebrates" heading. Information in this section is out of date and should be amended with the following. Note also that the Latin name "pizzinii" is misspelled throughout.

A more recent survey (February 2005) by Hobson, David Culver (American University), and others found both *Stygobromus pyzini* and *Stygobromus* sp. 15 to be present in groundwater seeps in the park.

Regulatory and Coordination Needs

1. *Air Quality Regulation*. As indicated above ("Environmental Impacts and Mitigation," items 3(b) and 3(c)), the Park Service must obtain an open burning permit from DEQ in the event open burning of debris is contemplated in connection with any activities under the Plan. In addition, an air pollution control permit may be required for the construction and operation of any fuel-burning equipment, including equipment used in construction activities. The Park Service should contact DEQ's Northern Virginia Regional Office (Terry Darton, Air Permits Manager, telephone (703) 583-3845) to ascertain open burning and air pollution control permitting requirements.

2. *Water Resources*. In the event wetlands are found and delineated on Park property as pre-requisite to the construction of facilities, the Park Service must submit the delineation report to the Army Corps of Engineers for a jurisdictional determination (Bob Hume, Chief, Regulatory Branch, telephone (757) 201-7657). If wetland or stream impacts are proposed, a Virginia Water Protection Permit may be required from DEQ; questions may be addressed to DEQ's Northern Virginia Regional Office (John Bowden, Deputy Regional Director, telephone (703) 583-3880).

Ms. Audrey F. Calhoun
Page 14

Some activities undertaken pursuant to the Plan may qualify for a Nationwide Permit from the Army Corps of Engineers. Accordingly, the Park Service should contact the Corps (see above) to determine whether the activity qualifies for a Nationwide Permit. There would be no need for additional coordination with DEQ if DEQ has provided section 401 certification for a Nationwide Permit that authorizes the activity in question.

3. *Natural Heritage Resources and the Document*. For additional information on the suggestions for the document (see "The Document," above), the Park Service may contact the Department of Conservation and Recreation's Division of Natural Heritage (Gary Fleming, telephone (804) 786-9122).

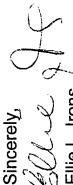
4. *Coordination with Fairfax County*. Questions on Fairfax County's comments or review may be addressed to the County's Department of Planning and Zoning (Deborah Albert, telephone (703) 324-1380).

5. *Historic Resources*. To ensure compliance with section 106 of the National Historic Preservation Act, the Park Service should consult with the Department of Historic Resources (State Historic Preservation Office) before proceeding with activities that may affect historic structures or archaeological resources. Questions may be addressed to that Department (Dr. Ethel Eaton, telephone (804) 367-2323, extension 112).

6. *Solid and Hazardous Waste Management*. Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable laws and regulations. See "Environmental Impacts and Mitigation," item 5(b), above for citations.

Thank you for the opportunity to review this document. We look forward to reviewing the Final EIS and General Management Plan. For clarification of these comments, please feel free to contact me (telephone (804) 698-4325) or Charlie Ellis of this Office (telephone (804) 698-4488).

Sincerely,


Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures
cc (next page)

Ellis, Charles

From: Andrew Zadnik (Andrew.Zadnik@dgif.virginia.gov)
 Sent: Wednesday, September 21, 2005 2:03 PM
 To: Ellis, Charles
 Cc: Project Review, Richmond_PO.DGIF@dgif.virginia.gov
 Subject: Re: NPS: Great Falls Park_DEQ-05-222F_ESSLOG 21070

This project involves implementation of a general management plan for Great Falls Park, Fairfax. Under the preferred alternative the following actions would be included: the park would provide technical assistance on water resource management, including techniques to reduce runoff; a Trail Management Plan would be prepared to inventory all trails and determine whether to maintain or eliminate trails; and the park would incorporate regional trails into the park at potential access points, including Difficult Run. Common elements of both alternatives would include developing an Integrated Resource Management Plan and encouraging park boundary changes where land can be added.

We generally support the Preferred Alternative. We encourage proper trails management in order to discourage new social trails and reduce the potential for damage to sensitive resources. We recommend that any water management technical assistance programs emphasize the importance of riparian buffers and the use of Low Impact Development.

We caution against any new activities, including trail development, along Difficult Run. Difficult Run has been designated a Threatened and Endangered Species Water due to the presence of State Threatened wood turtles. There are other streams in the vicinity of Great Falls Park that also support this species. As such, we recommend an inventory of the park to determine the current status of wood turtles. Wood turtles are found primarily in and around clear brooks and streams in deciduous woodlands. Although highly terrestrial, wood turtles typically remain in moist areas. As with any long-lived and slow-reproducing species, the loss of a single wood turtle can have a devastating effect on the entire population.

To aid in the long-term conservation of wood turtles in Virginia, we recommend that an undisturbed riparian buffer of at least 300 ft in width be maintained along the entire length of Difficult Run and other potential streams that are known or likely to have the potential to support this species. We recommend 100-ft buffers along any intermittent streams. In addition, we recommend incorporating wood turtle conservation into park interpretive education programs. This could include the use of appropriate signs at park visitor education wood turtles, including the species' conservation and legal status in Virginia. It is a violation of Virginia law to harm or keep for personal possession a wood turtle. Further information about wood turtles can be found online at: http://www.dgim.virginia.gov/wildlife/conservation/wood_turtles.asp#id=00000000.

The Potomac River is a Confirmed Anadromous Fish Use Area. In study, we recommend any activities that will help improve water quality and aquatic habitat in the Potomac or its tributaries.

To aid in the conservation of all wildlife, we strongly encourage park expansion, either through direct purchase or conservation easements.

Thank you,

Andrew K. Zadnik
 Environmental Services Section Biologist
 Department of Game and Inland Fisheries
 4010 West Broad Street
 Richmond, VA 23230

(804) 367-2733
 (804) 367-2427 (fax)

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Ms. Audrey F. Calhoun
 Page 15

cc: Andrew K. Zadnik, DGIF
 Keith R. Tignor, VDAOS
 Scott Bedwell, DCR
 Gary Fleming, DCR-DNH
 Allen R. Brockman, DEQ-Waste
 Kotur S. Narasimhan, DEQ-Air
 John D. Bowden, DEQ-NVRO
 Ann M. Regn, DEQ-EE
 Ethel R. Eaton, DHR
 Katherine K. Mull, NVRC
 Deborah L. Albert, Fairfax County
 Deborah Feldman, NPS-GWMP

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a Federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED


SEP 23 2005

DEQ Office of Environmental
Impact Review

CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. No additional comments are necessary in reference to endangered plant and insect species regarding this project.

(signed)	 (Keith R. Tignor)	September 20, 2005
(title)	Endangered Species Coordinator	(date)
(agency)	VDACS, Office of Plant and Pest Service	

PROJECT # 05-222F

8/98

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Allen Brockman at (804) 698-4468.

>>> "Ellis, Charles" <chellis@deq.virginia.gov> 09/07/05 2:40 PM >>>
 Everybody - it is not yet reminder time for this review. However, in case anyone is
 interested, I have learned that the Park Service will have a public meeting, to take
 comments, from 1 to 3 PM on Saturday, September 17, at the Park's visitor centre.

Charlie Ellis

DSO, Office of Environmental Impact Review

September 7, 2005

Ellis, Charles

From: Andrew Zadnik [Andrew.Zadnik@dgif.virginia.gov]
Sent: Wednesday, September 21, 2005 2:03 PM
To: Ellis, Charles
Cc: ProjectReview.Richmond_PO.DGIF@dgif.virginia.gov
Subject: Re: NPS: Great Falls Park_DEQ-05-222F_ESSLOG21070

This project involves implementation of a general management plan for Great Falls Park, Fairfax. Under the preferred alternative the following actions would be included: the park would provide technical assistance on water resource management, including techniques to reduce runoff; a Trail Management Plan would be prepared to inventory all trails and determine whether to maintain or eliminate trails; and the park would incorporate regional trails into the park at potential access points, including Difficult Run. Common elements of both alternatives would include developing an Integrated Resource Management Plan and encouraging park boundary changes where land can be added.

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To aid in the long-term conservation of wood turtles in Virginia, we recommend that an undisturbed riparian buffer of at least 100 ft in width be established and/or enhanced along Difficult Run and other potential streams that are known or have the potential to support this species. We recommend 100-ft buffers along any intermittent streams. In addition, we recommend incorporating wood turtle conservation into park environmental education programs. This could include the use of appropriate signs to inform park visitors about wood turtles, including the species' conservation and legal status in Virginia. It is a violation of Virginia law to harm or keep for personal possession a wood turtle. Further information about wood turtles can be found online at: <http://www.dgif.virginia.gov/species/conservation.asp>

The Potomac River is a Confirmed Endangered Fish Use Area. The park should recommend any activities that will help improve water quality and aquatic habitat in the Potomac or its tributaries.

To aid in the conservation of all wildlife, we strongly encourage park expansion, either through direct purchase or conservation easements.

Thank you,

Andrew K. Zadnik
 Environmental Services Section Biologist
 Department of Game and Inland Fisheries
 4010 West Broad Street
 Richmond, VA 23230

(804) 367-2733
 (804) 367-2427 (fax)

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2

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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- Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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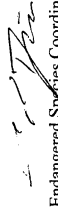
SEP 21 2005

DEQ Office of Environmental
Impact Review

CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. No additional comments are necessary in reference to endangered plant and insect species regarding this project.

(signed)	 (Keith R. Tignor)	September 20, 2005
(title)	Endangered Species Coordinator	(date)
(agency)	VDACS, Office of Plant and Pest Service	

PROJECT # 05-222F

8/98



COMMONWEALTH OF VIRGINIA

W. Taylor Murphy, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P. O. Box 10099, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
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Robert G. Burnley
Director
(804) 698-4000
1-800-592-5182


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SEP 21 2005

DEQ Office of Environmental
Impact Review

MEMORANDUM

TO: Charles H. Ellis, Environmental Program Planner

FROM:  Allen Brockman, Waste Division Environmental Review Coordinator

DATE: September 21, 2005

COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; file

SUBJECT: Environmental Impact Statement; General Management Plan for Great Falls Park—DEQ Project # 05-222F

The Waste Division has completed its review of the Environmental Impact Statement for the a General Management Plan for Great Falls Park. We have the following comments concerning the waste issues associated with this project:

Solid waste issues and sites were addressed in the plan. However, hazardous waste issues and sites were not addressed in the plan. Nor did the plan include a search of DEQ's waste-related data bases. However, the Waste Division staff conducted a cursory review of its data files and did not identify any waste sites that would impact or be impacted by the plan.

Any soil that is suspected of contamination or wastes that are generated during plan activities must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Also, structures to be demolished/renovated/removed in accordance with plan activities should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to taking such action. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

**DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION**

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Allen Brockman at (804) 698-4468.

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Charles H. Ellis III DEQ - OEIA PROJECT NUMBER: 05 - 222E

PROJECT TYPE: ☐ STATE EA / EIR / FONSI ☒ FEDERAL EA / EIS ☐ SCC **RECEIVED**

☐ CONSISTENCY DETERMINATION/CERTIFICATION SEP 08 2005

PROJECT TITLE: GENERAL MANAGEMENT PLAN FOR GREAT FALLS PARK DEQ Office of Environmental

PROJECT SPONSOR: DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE Impact Review

PROJECT LOCATION: ☒ OZONE NON ATTAINMENT AREA

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: ☒ CONSTRUCTION ☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3. ☐ 9 VAC 5-40-5490 et seq. - Asphalt Paving operations
4. ☒ **9 VAC 5-40-5600 et seq. - Open Burning**
5. ☒ **9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to
7. ☐ 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8. ☐ 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
9. ☐ 9 VAC 5-80-10 et seq. of the regulations - Permits for Stationary Sources
10. ☐ 9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. ☐ 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

Being in an area of ozone non-attainment, all precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx) during any construction activity.

K. S. Narasimhan
(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: September 8, 2005

Ellis Charles

From: Bowden, John
Sent: Monday, September 19, 2005 8:22 AM
To: Ellis, Charles
Subject: EIS #05-222F

NVRO comments regarding the General Management Plan for Great Falls Park project sponsored by the Department of the Interior/National Park Service are as follows:

The U. S. National Park Service (NPS) is proposing a general management plan for Great Falls Park with the intention of managing the park land over the next 15 years. The draft plan indicates that impacts to wetlands are not anticipated. Impacts to streams were not discussed.

The location of the wetlands were determined based upon a review of the National Wetland Inventory Maps for the site. The National Wetland Inventory Maps do not represent the legal boundaries of wetlands and stream channels, and these maps are often significantly inaccurate. The actual boundaries of wetlands and stream channels regulated by the Virginia Water Protection (VWP) Permit Program are determined by a wetland delineation that is confirmed by the United States Army Corps of Engineers (USACE).

In the event that work is proposed (i.e. new trail, etc.), DEQ recommends conducting a wetland delineation of the proposed project area to determine if wetlands and/or streams are present. NPS would then need to contact the USACE to receive confirmation of the wetland delineation. If wetlands and streams are proposed for impact, then a VWP permit will be required.

Please note that certain activities may qualify for a Nationwide Permit (NWP) from the USACE. If an activity is proposed to impact wetlands and streams, NPS should contact USACE to determine if the activity qualifies for a NWP. If a NWP is authorized for the activity which the VWP Program has provided 401 Certification, then no further coordination with VWP would be required.

John D. Bowden
 Deputy Regional Director
 Department of Environmental Quality
 Northern Virginia Regional Office
 703) 583-3880
 dbowden@deq.virginia.gov

3060 Williams Drive, Suite 510
 Fairfax, Virginia 22031
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Northern Virginia Regional Commission

Voice: 703-642-0700
 Fax: 703-642-5077

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SEP 21 2005

DEQ Office of Environmental
 Impact Review

September 20, 2005

Mr. Charles H. Ellis III
 Department of Environmental Quality
 Office of Environmental Impact Review
 629 East Main Street, Sixth Floor
 Richmond, VA 23219

Re: Federal Project 05-222F

The Northern Virginia Regional Commission staff has reviewed the application described above. Staff would like to note that the existing system of formal and social trails currently serves to provide park access for wide range of users. For example, a social trail provides an important link between the Fairfax County Stream Valley equestrian/hiking trail along Difficult Run and the Ridge Trail, making possible a circuit hike that includes the scenic Difficult Run Trail in Great Falls Park.

Staff recommends that the General Management Plan ensure that the internal trail system components of the plan coincide with existing and future plans for the Fairfax County trail network. In addition, the plan should provide for collaboration and cooperation with local government officials to identify a suitable alignment for the Potomac Scenic National Heritage Trail.

Thank you for this opportunity to participate in the intergovernmental review process.

Sincerely,

Katherine K. Mull

Katherine K. Mull
 Senior Environmental Planner

Project: Great Falls Park General Management Plan
 Sponsor: Department of the Interior/National Park Service

Chairman
 Hon. Barbara A. Smith
 Vice-Chairman
 Hon. Gerald E. Connelly
 Treasurer
 Hon. Harry J. "Big" Smith
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 Hon. Kristen C. Unstut

Town of Purcellville
 Hon. William T. Durkin, Jr.

Town of Vienna
 Hon. M. Jane Seeman

(as of August 29, 2005)

1/19/2005

W. Taylor Murphy, Jr.
Secretary of Natural
Resources



COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

217 Governor Street
Richmond, Virginia 23219-2010
Telephone (804) 786-7951 FAX (804) 371-2674 TDD (804) 786-2121

Joseph H. Maroon
Director

MEMORANDUM

DATE: September 26, 2005

TO: Mr. Charles H. Ellis, III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, Va. 23219
chellis@deq.state.va.us
(804) 698-4488

FROM: Robert Munson, Planning Bureau Manager
Virginia Department of Conservation and Recreation

SUBJECT: DEQ-05-222F: DOI/NPS – General Management Plan for Great Falls Park

After review of the above referenced project, the Department of Conservation and Recreation's (DCR) Division of Planning and Recreation Resources offers the following comments on the subject project:

- The park should make stronger connections, both physically and interpretively, to the Potomac River Water Trail and provide portage opportunity.
- Maintaining river access, especially as it relates to the Chesapeake Bay Tributary Trails, Gateways Program, and the Potomac River Trail, is of utmost importance to the parks' management plan.
- There should be discussion of pets being limited to particular areas, or eliminated from particular areas; e.g. leash laws and where user conflicts occur.
- Implications, connections, and impacts to Scenic Byway 193 at Park should be discussed.

The Virginia Department of Conservation and Recreation's Natural Heritage Program (VANHP) strongly supports the adoption of Alternative B (Preferred Alternative). Furthermore, VANHP offers the following specific comments:

pp. 1.15 - 1.16 (RESOURCES POTENTIALLY AT RISK)

*State Parks • Soil and Water Conservation • Natural Heritage • Outdoor Recreation Planning
Chesapeake Bay Local Assistance • Dam Safety and Floodplain Management • Land Conservation*

The sentence "Some of these resources, including portions of the Potomac Gorge, presence of rare plant and biological species and its location within the Potomac River watershed, are critical to maintaining the significance and character of the Park" is very awkward. We suggest the following revision:

"Some of these resources, including a section of the Potomac Gorge, the presence of rare plants, animals, and biological communities, and the Park's location within the Potomac River watershed, are critical to maintaining the significance and character of the Park."

p. 2.15 (Resource Condition or Character)

Nowhere in this document is the impact and management of invasive introduced species adequately addressed. Currently, the natural vegetation over much of Great Falls Park is being overrun by invasive exotic plants, including (but not limited to) Japanese still-grass (*Microstegium vimineum*), Chinese wisteria (*Wisteria sinensis*), garlic-mustard (*Alliaria petiolata*), Japanese honeysuckle (*Lonicera japonica*), bush-honeysuckle (*Lonicera maackii*), vinca (*Vinca minor*), and many others. The spread of these exotics is often compounded by other activities including excessive herbivory of native species by white-tailed deer, horseback riding, disturbance of soils by visitors, and Park management and construction activities. Managing invasive species will be absolutely critical to "preserving natural resources and settings." Without a commitment to such management, the viability of many natural communities in the Park will be heavily compromised in the near future. Although a cooperative project with The Nature Conservancy for spot control of invasives in critical areas is currently underway, much more will be needed in the future. If this is not the correct place in the document to address this issue, it should be spelled out in no uncertain terms elsewhere.

p. 3.32 (Vegetation)

The citation for footnote 32 should read:

Fleming, G.P., P.P. Coulling, K.D. Patterson, and K. Tavernia. 2005. The natural communities of Virginia: classification of ecological community groups. Second approximation. Version 2.1. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond, VA. <<http://www.dcr.virginia.gov/dnh/neintro.htm>>

Add the following paragraph to the vegetation discussion:

"Finally, the frequently flood-scoured channel shelf of the river above the falls contains good examples of the Piedmont/Mountain Low Herb Sand Bar/River Shore, Water-Willow Rocky Bar and Shore, Sycamore-River Birch River-Scour Woodland, and Mixed Bedrock Floodplain River-Scour Woodland communities. While these have not yet been formally ranked by Natural Heritage ecologists, at least two of them are likely to be globally and state rare (G. Fleming, VANHP, pers. comm.)."

pp. 3.33-3.34 (Sensitive Plant Species)

paupercula. Regionally uncommon species found in the riparian and terrace communities at the Park include

p. 3.38 (Invertebrates)

Information in this section is out of date and should be amended with the following. Note also that the Latin name "pizzinii" is misspelled throughout.

"A more recent survey (February 2005) by Hobson, David Culver (American University), and others found both *Stygobromus pyzini* and *Stygobromus* sp. 15 to be present in groundwater seeps in the park."

p. 4.3 (Impacts on Land Use and Socio-Economic Conditions/Visitor and Visitor Activities)

Public access to the Potomac River from the shoreline adjacent to the northern tip of the Flake to the northern tip of the Sand Box climbing area would be closed - we also recommend that the entire high bedrock terrace located south of the overlooks and adjacent to the south end of the picnic area be closed to public access. Because this area has no direct river access, it is less trampled than many other terrace areas and supports truly outstanding examples of riverside prairie and riverside outcrop barrens communities. Access should be permitted for scientific research and educational field trips.

p. 4.5 (Impacts on Transportation Systems)

Enhance emergency access at Sandy Landing - two significant (globally rare) biological community occurrences and two rare plant populations about the existing Sandy Landing access road on the north side. Of particular note, the Bedrock Terrace Oak-Hickory Forest at this location contained 126 species in a 400 m² plot, representing the most species-rich vegetation ever recorded (in more than 3,500 plots state-wide) in Virginia by VANHP ecologists. Any enhancements to this access should be designed to completely avoid impacting these biological elements.

p. 4.17 (Impacts on Natural Resources: Rare, Threatened and Endangered Species)

Prepare a Climbing Management Plan, etc. - we recommend that the Park engage the climbing community in the preparation of this plan. Similar plans for other Park service units (notably BLRP) have shown that early involvement of climbing constituents in the development of plans, combined with environmental education about the cliff resources that are important, led to less adversarial outcomes and resulted in greater protection of resources while allowing climbers access to desirable areas.

DCR's Division of Chesapeake Bay Local Assistance has reviewed the General Management Plan for Great Falls Park as requested and offers the following comments:

Although the management plan generally appears to be consistent in that there are proposed improvements to eroding areas and trails in sensitive areas are being limited, the EIR does not

Additional inventory work, changes in ranks, and changes in nomenclature since 1994 have combined to make this section somewhat out-of-date and inaccurate. We have taken the liberty of rewriting most of it to incorporate these changes and make it current as of September 2005. Ranks follow the Townsend (2004) document cited earlier in the "Vegetation" section. Note also that several misspellings have been corrected.

"Relatively recently, record searches and field surveys were performed to identify sensitive plant species present at Great Falls National Park. From October 1992 through September 1993, research was conducted by Cris Fleming to identify and locate rare plant species at the park.³⁶ From October 1993 to October 1994, Fleming conducted research to identify and locate watch list and uncommon plant species present at the park.³⁷ From late 2002 through 2004, VANHP ecologist Gary Fleming documented additional rare species occurrences while conducting an intensive study of the park's vegetation ecology. VANHP botanist John F. Townsend and NPS botanist Brent Steury also documented rare plant populations during the past several years. The areas of sensitive vegetation habitat identified in Cris Fleming's reports, as well as the more recent fieldwork, correspond to several of the conservation targets specified in The Nature Conservancy's conservation plan.

Riparian communities occur along the Potomac River at elevations that flood relatively frequently and are dominated by species associated with floodplains (see Figure 3.6). Riparian communities are subject to stress by At Great Falls Park, the sandy/gravelly shores and bedrock floodplain north of the falls provides habitat for rare species including *Spartina pectinata* (G5S2), *Eleocharis compressa* (G4S2), *Solidago racemosa* (G5T3?S1), *Desmodium cuspidatum* var. *cuspidatum* (G5T5?S2), and *Hemicarpha micrantha* (G5S1). The floodplain forest above the falls contains the rare species *Hasteola suaveolens* (G3G4S2), *Erythronium albidum* (G5S2), *Maianthemum stellatum* (G5S2?), and a large colony of *Valeriana pauciflora* (G4S2). Watch list species identified in riparian communities at the park include *Baptisia australis*, *Cardamine douglasii*, *Carex conjuncta*, *Carex hirtifolia*, *Erigenia bulbosa*, and *Floerkea proserpinacoides*.

Terrace communities include bedrock terrace, outcrop, and cliff areas located at higher elevations along the Potomac River that are flooded less frequently than riparian areas and are dominated by upland species At Great Falls Park, the greatest concentration of rare plants occurs south of the falls in terrace communities. The globally rare *Amelanchier nantuckensis* (G3Q5S1), as well as the state-rare species *Carex straminea* (G5S1), *Cerastium arvense* ssp. *velutina* (G4T4?S2?), *Eleocharis compressa* (G4S2), *Helianthus occidentalis* (G5S1), and *Solidago racemosa* (G5T3?S1) occur in the bedrock terrace area. Another globally rare plant, *Sida hermaphrodita* (G2G3S1), was recorded in a gully of the bedrock terrace in 1979 but has not been seen recently. The rocky bluffs and sandy coves area supports the rare species *Hasteola suaveolens* (G3G4S2), *Solidago rupestris* (G4?S1), *Solidago racemosa* (G5T3?S1), *Rhododendron arboreum* (G4G5S2), *Helianthus occidentalis* (G5S1), and *Cerastium arvense* ssp. *velutina* (G5T4?S2?). Within the Terrace Forest area near Sandy Landing, the rare *Arabis shortii* (G5S2) and *Onosmodium virginianum* (G4S2) are found. The only known Virginia population of *Carex davisi* (G4S1) was recently found by Brent Steury in a disturbed area of the Terrace near Matildaville. Watchlist species identified in terrace communities at the park include *Baptisia australis*, *Cornus amomum* ssp. *obliqua*, *Juglans cinerea*, and *Packera*

specifically address concerns with regard to the Chesapeake Bay Preservation Act; Virginia Code sections 10-1-2100 through 10-1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Code §9 VAC 10-20-10 et seq. and incorrectly identifies Chesapeake Bay Preservation Areas as "...tidal areas within 100 feet of water resources critical to the water quality of the Bay, such as permanent tributaries, are designated and managed as Resource Protection Areas".

Please note that:

Chesapeake Bay Preservation Areas are comprised of Resource Protection Areas (RPA) and Resource Management Areas (RMA).

RPAs include tidal shores, tidal wetlands, non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or water bodies with perennial flow, and a 100-foot buffer located landward of these features.

RMAs include land types that, if improperly used or developed, have a potential for causing significant water quality degradation or for diminishing the functional value of the RPA. RMAs are subject to the general performance criteria found in §9 VAC 10-20-120, including minimizing land disturbance, preserving indigenous vegetation, and minimizing impervious surfaces.

Fairfax County has designated all areas that are not RPA to be RMA. Passive recreation facilities such as boardwalks, trails and pathways are conditionally exempt in the RPA provided that for any land disturbance over 2,500 square feet, the project must comply with the requirements of the *Virginia Erosion & Sediment Control Handbook*, Third Edition, 1992.

In addition, stormwater management criteria consistent with water quality protection provisions (§4 VAC 3-20-71 et seq.) of the *Virginia Stormwater Management Regulations* (§4 VAC 3-20) shall be satisfied.

Thank you for the opportunity to comment on this project.

Sincerely,



Robert S. Munson
Planning Bureau Manager



Department of Planning & Zoning
Director's Office
12055 Government Center Parkway
Suite 730
Fairfax, Virginia 22035-5506

(703) 324-1325 Fax (703) 324-3924

V I R G I N I A

October 4, 2005

Ms. Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Dear Ms. Calhoun:

The Fairfax County Department of Planning and Zoning has reviewed the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Great Falls Park. The document analyzes a continuation of current conditions as well as a preferred action alternative. The preferred alternative (Alternative B) would prepare Trail and Climbing Management Plans, implement traffic management strategies, provide improvements to the existing visitor center and construct two new facilities for maintenance activities and United States Park Police (USPP) stables.

The GMP/EIS states that the new maintenance facility would be constructed at the location of the existing maintenance facility and USPP trailer and that Best Management Practices (BMPs) would be used in the construction of the new facility in order to reduce storm water runoff and improve water quality. Section 4.3.3 further states that both the visitor center and the existing maintenance facility are within the 100-year floodplain of the Potomac River. The final GMP/EIS should also recognize that these facilities are on an area designated by Fairfax County as a Resource Protection Area (RPA). These areas are already disturbed and largely consist of impervious surface; therefore, improvements to the visitor center and construction of a new maintenance facility do not appear as if they will have a negative effect on water quality. Under the Chesapeake Bay Preservation Ordinance, redevelopment is an allowed use in an RPA, as long as the area of impervious surface is not increased for construction of the new facility.

According to the adopted Fairfax County Trails Plan, the proposed Potomac Heritage National Scenic Trail (PHNST) veers north near the point where it enters the Great Falls Park site in the southern corner and then generally follows the property line, crosses Difficult Run and connects to Ridge Trail inside the park. A separate Georgetown Pike Trail, envisioned as an eight-foot wide stone dust trail, follows the Pike and runs northwesterly. Another eight-foot wide stone dust trail follows River Bend Road on the park side. The Cross County Trail coincides with the Difficult Run Stream Valley Trail. In addition, on-road bike lanes are planned along Old Dominion Drive, Georgetown Pike and River Bend Road. It is suggested that the trails portrayed

Ms. Audrey F. Calhoun, Superintendent
Page 2

on Figures 2.1, 2.2 and 2.3 of the report be consistent with those shown on the Fairfax County Trails Plan.

The Georgetown Pike Trail should generally be located within the State right-of-way. It is not known if Great Falls Park will provide the easement for trail construction where State right-of-way is not available. It may be beneficial for the trail, which is located along the Georgetown Pike frontage very close to the park, be incorporated into the park's trail systems.

We applaud the National Park Service (NPS) in its efforts to balance recreational opportunities with the protection of natural and cultural resources at Great Falls Park. Should Alternative B be chosen for the preferred course of action, we encourage the NPS to continue to work with both the recreational and scientific communities in developing trail and climbing management plans in ways that would further this goal.

Please note that the Fairfax County Park Authority staff is also reviewing the GMP/EIS and may be providing comments to you under separate cover. If you have any questions, please do not hesitate to call Deborah Albert of my staff at (703) 324-1380. I thank you for the opportunity to provide these comments.

Sincerely,

James P. Zook
Director

JPZ:DLA

cc:

Board of Supervisors
Anthony H. Griffin, County Executive
Robert A. Stalzer, Deputy County Executive
Charles H. Ellis, III, Virginia Department of Environmental Quality
Michael A. Kane, Fairfax County Park Authority
Pamela G. Nee, Fairfax County Department of Planning and Zoning
Deborah Albert, Fairfax County Department of Planning and Zoning
Sheng-Jieh Leu, Fairfax County Department of Planning and Zoning

12/20/02



FAIRFAX COUNTY PARK AUTHORITY

12055 Government Center Parkway, Suite 927
Fairfax, VA 22035-1118



December 13, 2005

Jon James, Acting Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

Subject: Great Falls Park, Virginia
June 2005 Draft General Management Plan / Environmental Impact Statement

Dear Mr. James:

The Fairfax County Park Authority (FCPA) has reviewed the Great Falls Park, Virginia, Draft General Management Plan / Environmental Impact Statement (GMP) dated June 2005, and offers the following comments.

The GMP presents two alternatives: Alternative A provides for minimal planning for recreational use and resource protection; Alternative B seeks a balance between recreational use and resource protection.

FCPA supports Alternative B as it improves regional opportunities for recreation and resource protection that is consistent with the Park Authority mission and supports desirable park experiences in FCPA parks that border Great Falls Park. We offer the following general comments.

FCPA Property Relationship to Great Falls Park

FCPA owns and manages two parks abutting Great Falls Park, Riverbend Park to the north and Difficult Run Stream Valley Park to the south.

Shared recreational resources include three trails: Old Carriage Road Trail, a hiking/biking/horseback riding trail, continues north into Riverbend Park; River Trail, a hiking trail (and a portion of the Potomac Heritage National Scenic Trail) also continues north into Riverbend Park; and Difficult Run Trail, a hiking/biking/horseback riding trail, continues from Difficult Run Stream Valley Park into Great Falls Park.

Jon James
December 13, 2005
Page 2

Shared natural resources include rare plant communities in the northeast of the park, abutting Riverbend Park, and sensitive plant species in the southwest, abutting Difficult Run Stream Valley Park.

Natural Resources

National Park Service (NPS) has identified rare plant communities in the northeast of the park, abutting Riverbend Park, and sensitive plant species in the southwest, abutting Difficult Run Stream Valley Park. (GMP, pp. 3.33-3.36.) FCPA supports the proposed elimination of social trails and the prohibition of additional trails in this area to better protect these communities (GMP, 4.17). Further, FCPA requests that NPS work cooperatively with FCPA in the development of the management plan for this area.

Recreational Uses

User Impact

Projected continuing population growth in Fairfax County will result in increased demand for recreation facilities. Fairfax County's population increased 21% from 1990 to 2000, and is expected to increase at nearly the same rate by 2013. This growth will result in a concomitant demand on park resources. The GMP notes that the availability of parking is the biggest determinant on the number of visitors to Great Falls Park. (GMP, p. 4.6.) If visitors cannot visit Great Falls Park because no parking is available, they may choose to visit nearby Riverbend and Difficult Run Stream Valley parks, overstressing both parks' resources. Therefore, FCPA supports transportation improvements, as described in Alternative B (GMP, pp. 4.5, 4.18-4.19.)

Trail Changes

Great Falls Park shares three trails with trails in Park Authority parks: Old Carriage Road Trail, a hiking/biking/horseback riding trail; River Trail, a hiking trail; and Difficult Run Trail, a hiking/biking/horseback riding trail. The GMP proposes preparing a Trail Management Plan which will include:

- inventorying all formal and social trails, noting condition and any need for improvements, and whether to maintain or eliminate trails;
- removing most social trails, and prohibiting new social trails; and
- controlling equestrian access through permitting to limit damage to resources.

(See GMP, p. ES4, 2.8, 2.12, 4.18)

Jon James
December 13, 2005
Page 3

FCPA supports the proposed development of a Trail Management Plan and requests that NPS work cooperatively with FCPA in the development of the trail plan. The Park Authority further supports proposed improvement of signage within Great Falls Park to identify allowable uses on trails. (GMP, p. 4.2.) We concur with comments provided by Fairfax County Department of Planning and Zoning to include consideration of the Countywide Trails Plan in the development of planned trail routes and connections.

According to the 2004 FCPA Parks and Recreation Needs Assessment, hiking/walking on trails is one of the most popular leisure activities for Fairfax County residents. Almost half of Fairfax County's residents participate in hiking/walking on trails. Forty percent of Fairfax County's population expressed a need for unpaved hiking/walking trails; 7 percent expressed a need for equestrian trails. The proposed GMP supports these trail user needs.

The Cross County Trail (CCT) runs east-west through Difficult Run Stream Valley Park into Great Falls Park. The Park Authority requests that the CCT be indicated with signage along Difficult Run to the Potomac River. FCPA will provide the appropriate signs.

Thank you for the opportunity to comment on this GMP/EIS. FCPA looks forward to working with NPS to implement this plan.

Yours truly,



Lynn S. Tadlock
Director
Planning and Development Division

cc: Kevin Fay, Dranesville District Representative, Park Authority Board

Michael A. Kane, Director

Timothy K. White, Deputy Director

James Zook, Director, Department of Planning and Zoning

Cindy Messinger, Director, Resources Management Division

Sherry Fear, Landscape Architect, Park Planning Branch

Noel Kaplan, Environmental Planner, Department of Planning and Zoning

Michael Rterson, Manager, Resource Stewardship Branch

Marty Smith, Manager, Riverbend Park

Sandra Stallman, Acting Manager, Park Planning Branch



**FAIRFAX
COUNTY**

VIRGINIA

**COUNTYWIDE NON-MOTORIZED
TRANSPORTATION COMMITTEE**
12055 Government Center Parkway, Suite 700
Fairfax, Virginia 22035-5505

(703) 324-1380 Fax (703) 324-3056

December 9, 2005

Ms Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Reference: Great Falls Park, Virginia, Draft General Management Plan/Environmental Impact Statement, June 2005

Dear Ms Calhoun:

The Fairfax County Non-Motorized Transportation Committee (NMTC) has reviewed the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Great Falls Park, Virginia released to the public in June 2005. The NMTC believes that the National Park Service has done a good job identifying ways to connect the trail system of the Great Falls Park with the extensive network of trails adjacent to Great Falls Park called for on the Fairfax County County-Wide Trails Plan (FC Trails Plan). This interconnected system of trails will be an excellent recreational asset to the visitors to Great Falls Park and users of Fairfax County trails.

The NMTC, however, has some specific concerns and comments about the draft GMP/EIS. One concern is the status of the roadside trails and on-road bike routes along Georgetown Pike and River Bend Road called for in the FC Trails Plan. If these trails are not part of the park plan, it will create significant missing links in these continuous trails along these roads as envisaged in the FC Trails Plan. Another concern is the proposal to require permits for equestrian use of the park. The NMTC believes that it is unfair to use this management approach for only this one user group. Our detailed comments are provided as an enclosure with this letter.

Ms Audrey F. Calhoun, Superintendent
Page 2

Please contact me by telephone (703.758.8183) or email (bruce.wright@conncd.us) if you have any questions regarding our comments or would like to discuss these issues with the NMTC.

Sincerely,

Wade H. Smith

for Bruce Wright
Chairman

Enclosure

cc:
Fairfax County Board of Supervisors
Anthony Griffin, Fairfax County Executive
Michael A. Kane, Fairfax County Park Authority
Sheng-Jieh Leu, Fairfax County Department of Planning and Zoning

Fairfax County Countywide Non-Motorized Transportation Committee
Submitted 9 December 2005

Comments on the
Great Falls Park, Virginia
Draft General Management Plan/ Environmental Impact Statement
Dated June 2005

The Fairfax County Countywide Non-Motorized Transportation Committee (NMTC) is pleased to provide comments on the draft *General Management Plan/Environmental Impact Statement (GMP/EIS)* for *Great Falls Park, Virginia*, released by the National Park Service in June 2005.

In general, the National Park Service (NPS) has done a good job identifying ways to connect the trail system of the Great Falls National Park with the extensive network of trails called for in the Fairfax County Countywide Trails Plan (FC Trails Plan). However, the NMTC has the following specific concerns about the draft GMP/EIS.

- 1) *The GMP/EIS should include trails along Georgetown Pike and River Bend Road in accordance with the Fairfax County Countywide Trails Plan.* The GMP/EIS is vague about complying with the FC Trails Plan, stating only that the NPS will "explore" connecting park trails with the Georgetown Pike and other Fairfax County trails at several locations. Not building these trails will create permanent missing links in the continuous trails along Georgetown Pike and River Bend Road called for in the FC Trails Plan.

The GMP/EIS states in Section 2.4.7 that consideration of the Georgetown Pike Trail is deferred because the route of the Potomac Heritage National Scenic Trail outside the park has not yet been determined. While the NMTC agrees that these two trails should be coordinated, the Georgetown Pike Trail should be constructed in accordance with the FC Trails Plan regardless of the future route selected for the Potomac Heritage National Scenic Trail.

The GMP/EIS also states in Section 2.4.7 that consideration of the Georgetown Pike trail is deferred because of "potential impacts on the park's natural resources." However, these potential impacts are not described or analyzed. These impacts should be identified and shown why they are significant enough to warrant deferral of consideration of this trail at this time.

The GMP/EIS gives no reason why the GMP/EIS does not include the trail along River Bend Road called for in the FC Trails Plan.

The NMTC is concerned that incorporating the Georgetown Pike and River Bend Road trails into the GMP at a later date will require the NPS to issue a supplement to the EIS, which will be expensive and time-consuming for the NPS.

The NMTC suggests that these trails be included in principle in the current GMP/EIS while stating that the exact routes of these trails will be determined at the time of implementation to minimize and mitigate environmental effects and to utilize the topography in the most efficient and cost-effective way when determining the route.

- 2) *The GMP/EIS should include a trail along Old Dominion Drive inside the park.* The GMP/EIS states in Section 2.4.7 that consideration of a trail along Old Dominion Drive inside the park is deferred because the route of the Potomac Heritage National Scenic Trail outside the park has not yet been determined and because of "potential impacts on the park's natural resources." The NMTC believes this trail is needed to accommodate pedestrian access to the park from the trails along Georgetown Pike and Old Dominion Drive outside the park called for in the FC Trails Plan. Also, the "potential impacts on the park's natural resources" are not described or analyzed for this trail. These impacts should be identified and shown why they are significant enough to warrant deferral of consideration of this trail at this time.

- 3) *The GMP/EIS does not discuss how road bicycle access to the park would be improved and accommodated.* The park is currently a destination for road bicyclists. Old Dominion Drive is now the only entrance to the park for road bicyclists and will remain so under the proposals in the GMP/EIS. Bicycle traffic to the park will increase significantly in the future as trails along Georgetown Pike and Old Dominion Drive are constructed, making bicycle access to the park easier and safer. The FC Trails Plan calls for an on-road bike route on Old Dominion Drive outside the park, along Georgetown Pike west of the park entrance, and along River Bend Road. The GMP/EIS should discuss how bicycle access to the park will be improved and accommodated and how the National Park Service will implement these requirements adjacent to park property. The NMTC believes that an on-road bike route or adjacent trail that can accommodate bicycles will be needed along Old Dominion Drive within the park and should be included in the GMP.

- 4) *Under Alternative B, a Trails Management Plan would be prepared, but the GMP/EIS does not describe what this plan would contain.* The proposed Trails Management Plan should be described in more detail. Would this plan be the vehicle for the National Park Service to determine how to implement the FC Trails Plan requirements?

- 5) *The proposed requirement for permits for equestrian access to the park is worrisome.* The NMTC supports the comments submitted by the Great Falls Trail Blazers and the Great Falls Citizens Association opposing the proposed requirement for equestrians to obtain permits to use park trails. The NMTC believes that a permitting system for public lands should be implemented only under extreme circumstances supported by a very strong analysis documenting why such a management approach is needed to meet environmental and other management goals. The GMP/EIS does not provide support for implementing such an extreme and burdensome management measure for only one park user group.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 2, 2005

Ms. Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

Re: Great Falls Park, Virginia Draft General Management Plan/Environmental Impact Statement
(CEQ #20050358)

Dear Ms. Calhoun:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS) also referred to as the Plan for the Great Falls Park in Virginia. As a result of this review, EPA has assigned this DEIS a rating of LO (Lack of Objections), which indicates that we have no objections to the proposal. A copy of EPA's ranking system is enclosed for your information.

EPA understands that the purpose of the Plan is to balance the opportunities for recreation at the park while protecting the sensitive natural resources and cultural resources. The Plan establishes a vision for managing the park over the next 10 to 15 years and includes a framework for decision-making and problem solving that is based on that vision. Two alternatives are proposed, Alternative A - Status Quo/Continue Current Management Practices and Alternative B - Preferred Alternative. Alternative A maintains the status quo in the park, and describes resource conditions where existing practices continue to guide park management. Alternative B proposes the protection of natural and cultural resources with the provision of a variety of recreational opportunities for visitors intending to improve their understanding of the park's sensitive resources and how to safely and responsibly enjoy the park.

As noted on page 4.1, "...additional environmental analysis may be conducted pursuant to NEPA, in instances where a specific action or activity, consistent with the goals and objectives of the GMP/EIS, is proposed." Although further environmental documentation may be forthcoming for a specific action/activity, EPA has provided the following comments for your consideration.

Customer Service Hotline: 1-800-138-2474

Floodplains

As stated on page 4.16, the proposed new operations facility is planned to occupy the present maintenance facility which is located in the 100-year floodplain. EPA appreciates the intentions of the National Park Service (NPS) to undertake a detailed study of this to identify the extent of the floodplain and the openness to locate the facility outside of the floodplain. However, it is determined that if the floodplain covers the majority of the site location, then the facility would be designed so that habitable space would be located above the flood zone. It should be noted that floodplain encroachments must be evaluated and coordinated with the Federal Emergency Management Agency (FEMA). Federal Executive Order 11988 (Floodplain Management) states, "If an agency has determined to, or proposes to, conduct, support, or allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains." Where no practicable alternatives exist, Executive Order 11988 goes on to state, "If property used by the general public has suffered flood damage or is located in an identified flood hazard area, the responsible agency shall provide on structures, and other places where appropriate, conspicuous delineation of past and probable flood height in order to enhance public awareness and knowledge about flood hazards." To promote public safety, we recommend that at a minimum, a permit condition be included to require conspicuous delineation of past and probable future flood heights at multiple locations across the project site. These signs should be in place within six months of permit issuance.

Terrestrial Resources

Page 4.16 states that, "The area off Jackson Lane is mostly wooded with some clear areas. Developing stables and a paddock area for horses may require clearing some of the existing vegetation in this area and could result in a minor adverse impact." The DEIS does not specify the approximate acreage of clearing needed nor does it delineate the vegetation that may be impacted.

Table 2.1: Description of Alternatives, under Administration and Alternative Concept B: Preferred Alternative, states, "Maintain existing use of well-based water system with an expanded holding tank on Jackson Lane. If necessary in the future, explore bringing public water to the park's facilities." The size and exact location of the expanded holding tank should be identified and a description of the current condition, use, terrestrial habitat of the potential impacted land provided.

Under Alternative B, it is proposed to demolish the existing maintenance facility and build a new operations facility at the same location. The footprint of the building is not mentioned in the DEIS; therefore, it is unknown the additional square footage needed for the proposed building and if there is a need to clear more of the area. If clearing is needed, the FEIS should specify and quantify the impacted resources.

building. Procurement of recycled goods is also necessary and helps to stimulate markets. As a consumer and purchaser of goods and services, the NPS is encouraged to make purchasing decisions with this in mind.

- **Painting/Carpeting.** All painting projects should make use of non-toxic paints, stains, exterior preservatives, and chemical-free carpeting. This can reduce long-term costs for removal of potential hazardous materials and provide better air quality.
- **Water Conservation.** In an effort to conserve water consumption, low-flow toilets should be installed in new and renovated buildings. To ensure adequate supply and quality of water, monitoring of the water table and chemical testing of the water should be conducted.
- **Energy Conservation.** Energy-efficient heating and cooling systems, proper building insulation, and the use of energy-efficient lighting can be incorporated in the design of renovated facilities to reduce cumulative impacts of energy consumption and encourage energy conservation. For example, take advantage of natural ventilation as well as using compact fluorescent lamps which consume considerable less electricity than do incandescent ones and last much longer. Install energy efficient windows and doors (for example, reflective glass).

Visitor Safety

As noted on page 3.12, there were 99 emergency medical incidents and three fatalities in 2004. More information on accident/incidents occurring in the park could be offered to support and/or to determine precautions that may be incorporated into the Plan. Signage may be useful in alerting visitors of dangerous areas.

Miscellaneous

Page 3.48, first paragraph, it appears as though a line could be missing.

Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Karen DeGrosso; she can be reached at 215-814-2765.

Sincerely,


William Arguto
NEPA Team Leader

Enclature

The FEIS should provide a complete description of the terrestrial habitat resources in the Jackson Lane study area to assess the cumulative impact that may result from the proposed actions. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated. In addition, the species should be mapped relative to habitat locations and species density.

Measures to avoid potentially adverse impacts to vegetation resources should be evaluated and implementation and mitigation plans to minimize impacts should be developed. Where such impacts cannot be avoided, adequate compensation developed through habitat assessment could be implemented.

Wetlands

No direct impacts to existing wetlands are proposed under Alternative B. The Plan proposes to eliminate existing social trails and prohibiting new social trails away from sensitive areas such as those adjacent to the Potomac River. The Plan may also propose to educate visitors through increased interpretive programs regarding benefits of preserving wetlands. EPA suggests that raised walkways be considered, where feasible, to prevent visitor impact to wetlands.

Pollution Prevention

Construction activities are proposed under Alternative B. EPA suggests that the following Pollution Prevention measures be incorporated into the design of the new building.

In October, 1990, Congress passed the Pollution Prevention Act which calls for a stepwise approach to addressing pollution: 1. Prevention or source reduction; 2. Recycling of material in an environmentally safe manner; 3. Treatment in an environmentally safe manner; and as a last resort; 4. Disposal or other release of pollution into the environment. The following principles are applicable with the proposed construction and renovation projects.

- **Paved Surfaces/Parking Areas.** To prevent runoff from newly developed areas from eroding steep areas, good environmental design should be employed to minimize and control runoff. Detention basins or paving with permeable asphalt or crushed stone may be appropriate where applicable.
- **Landscaping.** EPA suggests (where appropriate) that the grounds be landscaped with hardy native plant species to cut down on watering and lessen the need for pesticides and fertilizers. Liberal and judicious use of trees can help to reduce heating and cooling costs and act as air purifiers.
- **Recycling.** To promote the recycling of refuse generated by employees and visitors, recycling receptacles should be provided on the park grounds and within the proposed office

Environmental Impact Statement (EIS) Rating System Criteria

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

LO (Lack of Objections) - The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

EC (Environmental Concerns) - The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

EO (Environmental Objections) - The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantive changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

EU (Environmentally Unsatisfactory) - The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

1 (Adequate) - The draft EIS adequately sets forth the environmental impacts(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

2 (Uninsufficient Information) - The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3 (Unadequate) - The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.

12/14/05

GEORGE ALLEN
VIRGINIA
304 RUSSELL BENNETT DRIVE, BUILDING
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ENTERPRENEURSHIP



United States Senate

December 14, 2005

Acting Superintendent John James
Great Falls Park
9200 Old Dominion Drive
McLean, VA 22101

Dear Superintendent James:

I have been contacted by a good number of my constituents and others who are respectful recreational users of Great Falls Park. As I am sure you are aware, Great Falls Park is a valued recreational resource for Virginia and DC-area bicyclists, climbers, horseback riders, hikers, kayakers and other sporting enthusiasts. Many Virginians make use of the Park, and can be found enjoying the Park's recreational opportunities on any given day.

My constituents are concerned about the recent draft General Management Plan/Environmental Impact Statement that has recently been published for notice and comment. In particular, they are concerned that restrictions on recreational use of the Park-like a system of permits or the cordoning off of large areas of the park to prevent all human visitation-may add levels of bureaucracy and control that are unwarranted by the science or the circumstances. As a result, many of the Park's users may simply find use of the Park so burdensome, and prescriptive to make a pleasurable experience inaccessible. The result would be the loss of a precious, beautiful, unique resource to thousands of Virginia residents and visitors.

A more reasoned approach might be for the Park Services plan to involve a system of cooperation with local area boaters, bikers, climbers, equestrians and hikers. Such an approach might include a program of education and voluntary service to maintain and restore the Park's sensitive environmental resources, rather than some of the more onerous restrictions envisioned in the draft GMP/EIS. Northern Virginians and their guests who visit the Park have a profound respect for the Park's scenic treasures, and do not want to see them destroyed. At the same time, they do not want to see the Park's long tradition of providing recreational, sport and exercise opportunities to the region be usurped by those who would prefer to see large areas of the Park turned into *de facto* closed wilderness areas. Such goals seem unrealistic in light of the footprint left by nearly two-and-one-half centuries of human visitation at the Park.

CENTRAL VIRGINIA
SOUTHWEST VIRGINIA
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(800) 771-5221
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WESTERN AND VALLEY
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SOUTHWEST VIRGINIA
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NORTHERN VIRGINIA
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Superintendent John James
December 14, 2005
Page 2

Thank you for allowing me the opportunity to comment on this proposal, and I ask you to contact my staff in the event you have any questions or concerns regarding the position of my constituents on this very important matter. Please treat this letter in conformance with all applicable procedural rules and ethical guidelines.

With warm regards, I remain

Sincerely,

George Allen
George Allen

NK
HUNTER GRAFTS OFFICE BUILDING
WASHINGTON, DC 20510-2002

#01-00330

PAUL S. SARBANES
MARYLAND

United States Senate
WASHINGTON, DC 20510-2002

December 27, 2005

The Honorable Frances P. Mainella
Director
National Park Service
1849 C Street, N.W.
Room 3200
Washington, D.C. 20240

Dear Ms. Mainella:

Enclosed is a copy of correspondence I received from Jeanette Helfrich. The letter raises some serious concerns about Great Falls National Park. I would certainly appreciate it if you would carefully review this matter and provide me with an appropriate response.

Your attention to this matter is greatly appreciated.

With best regards,

Sincerely,

Paul Sarbanes

Paul Sarbanes
United States Senator

PSS/gpa
Enclosure

E-Mail Viewer

Page 1 of 1

#2 723482 - Ms. Jeanette Helfrich, In ID: 2449363, Out ID: 2568206

From: JeanetteHelfrich@comcast.net

Date: 12/19/2005 11:08:41 PM

Subject:

Dear Senator Sarbanes,

I want to bring to your attention actions that the National Park Service is proposing at the Great Falls National Park along in Potomac River in Virginia. These actions could have an severe adverse impact on Maryland, DC, and Virginia recreational users, specifically rock climbers, bicyclists, horseback riders, hikers, kayakers and other sporting enthusiasts. We are concerned about the recent draft General Management Plan/Environmental Impact Statement recently published for notice and comment. In particular, restrictions on recreational use of the Park - like a system of permits or the cordoning off of large areas of the park to prevent all human visitation - may add levels of bureaucracy and controls that are unwarranted by the science or circumstances.

A more reasoned approach might be for the Park Service plan to involve a system of cooperation with local area boaters, bikers, climbers, equestrians and hikers. Such an approach might include a program of education and voluntary service to maintain and restore the park's sensitive environmental resources, rather than some of the more onerous restrictions envisioned in the draft plan. To my knowledge as a user of the park since 1985, such burdens have not been imposed anywhere else in the entire national park system and are unwarranted here.

I would like to request that you consider sending a comment to the National Park Service. Attachment 2 is a similar comment that the Honorable George Allen sent to the NPS on December 14, 2005. For your information, I am also attaching a copy of the comment I sent to the NPS as Attachment 1. In addition, I urge you to monitor the appointment of a new Superintendent of the Park, recently vacated.

Sincerely,

Jeanette Helfrich
3100 Powder Mill Road
Adephi, Maryland 20783-1028
301-434-1964 day and evening
jeanettehelfrich@comcast.net
December 15, 2005

Enclosures:

- (1) Comment from Jeanette Helfrich to National Park Service, December 15, 2005
- (2) Letter from Senator George Allen to National Park Service, December 14, 2005

http://sarbanes-ig.800/te_asp/tma_text_popup_v2.asp?xxx=40984.55&oid=2568206&ro... 12/27/2005

Policy decisions concerning rock climbing should not be made unilaterally by the NPS. Instead such policies should be developed through consensus between the NPS and the rock climbing community. To develop policy and implementing actions through discussions and meetings with local climbing and outdoor clubs, organizations, gyms, clubs, and other interested parties would lead to rational uses of the park's resources balanced with the historic practices of climbing in the park. Rock climbers in this area are knowledgeable about the history and issues involved in climbing the park and will work proactively with the NPS in developing appropriate policies for the park.

While the plan generally recognizes climbing as an ongoing recreational activity in the park, it does not contain enough detail and analysis to justify the plan's burdensome impacts on climbing. Either of the plan's alternatives could cause a significant adverse impact on climbing without justification; however, I encourage adoption of Alternative A.

Overall Comment on Preference for Alternative A

The no-action Alternative A should be chosen as the preferred course of action. However, it was not thoroughly analyzed in the draft EIS to support its eventual selection as the preferred alternative. Most importantly, it is not a no-changes alternative as it purports to be. It would close and limit access to certain climbing areas such as the Microdome, Gorky Park, and Sand Box climbing areas, which are currently open. These actions would significantly change the *status quo* and should not be included in Alternative A as purporting to be a no-action alternative. Further, Alternative A does not provide for any input from climbers into these changes. Climbers need to be involved in any discussion of access to the rock cliffs under both alternatives. I support Alternative A, with the important modifications that the NPS work with climbing groups concerning the areas mentioned above. This compromise would then permit the current high quality of rock climbing experiences and other recreation in the park balanced with conserving other resources.

Overall Comments on Alternative B

The actions proposed in Alternative B are clearly unacceptable to a rational balance of climbing recreation with other resources in the park. Alternative B proposes the designation of climbing sites by bolt anchors, reductions in climbing sites, and controlling access to the climbing sites through the issuance of permits. This alternative purports to balance the protection of natural and cultural resources with the provision of a variety of recreational opportunities for visitors. But instead, it would value and protect natural and cultural resources above and beyond any recreational opportunities such as climbing. Moreover, the plan gives no justification for imposing such severe restrictions on climbing. The proposed actions would essentially end recreational climbing in the park. Moreover, the plan fails to explain why a Climbing Management Plan is necessary or the legal basis for development of such a plan. In general, this alternative's lack of detail and analysis makes light of the long-time culture, history and responsible self-regulation by local nonprofit recreational and environmental clubs and organizations.

Jeanette Helfrich
3100 Powder Mill Road
Adelphi, Maryland 20783-1028
301-434-1964
jeanettehelfrich@comcast.net
December 15, 2005

Ms. Audrey Calhoun, Superintendent
Great Falls National Park (GWMP, Superintendent@nps.gov)
National Park Service (703) 289-2500
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

RE: Comments on Draft Great Falls General Management Plan (GMP) and Environmental Impact Statement (EIS) for Great Falls Park

Dear Ms. Calhoun:

Thank you for the opportunity to comment on issues raised in the draft General Management Plan (GMP) and draft Environmental Impact Statement (EIS) (the plan) for managing Great Falls Park (the park). Please consider these comments on the decision points primarily involving natural and cultural resources, recreation, rock climbing, trails, traffic and administration and operations.

General comment and background

As an avid outdoors person, hiker, rock climber, mountaineer, and fan of our national parks, I have rock climbed all over the world. I have climbed at Great Falls National Park intensively since 1985 as a member of three nonprofit local climbing and outdoor clubs (details below). The plan's alternatives would personally affect my use of the park. I am 61, a retired lawyer, a voter in Prince George's County, Maryland, and am still an active rock climber at Great Falls.

Rock climbing is a cultural and historical use of the cliffs in the park. Rock climbing has existed as an established use in the park for nearly a century, long before the area became a national park. This practice and history of rock climbing should be recognized, encouraged and maintained in the park. By the location of these unique cliffs in an urban area, the park is one of the rare metropolitan areas in this country where it is possible to rock climb and practice mountaineering. The National Park Service (NPS) should adopt policies for preserving resources and encouraging recreation such as climbing appropriate for an urban area serving millions of people. It should provide significant recreational opportunities including rock climbing and not treat the park like a wilderness area as some would do.

The restrictions as proposed on rock climbing in Alternative B are overly broad and are not rationally supported by evidence or analysis presented in the plan. They are not narrowly tailored to specific threats of harm to cultural or natural resources. These restrictions need to be removed from the plan or in the very least, details need to be developed in consensus with climbing organizations. There should be no restrictions on climbing without legal evidence of clear threat of significant harm to natural resources and without precise tailoring of actions to potential harm.

Climbers and climbing groups need to be involved in developing plans and policies because climbers have the expertise and knowledge to help reach rational decisions and policies concerning climbing access and activities. The NPS should formally commit in the final GMP/EIS and Record of Decision to a process for interacting with climbers to develop rational and practical policies and actions.

I have climbed all over the world – in China, Nepal, Thailand, Switzerland, France, England, Spain, Italy, Greece, Slovenia, Croatia, Peru, Mexico, Canada, as well as most major areas in the U.S. Never have I encountered such bureaucratic obstacles and interference with climbing. I have never had to obtain a permit to climb in any of those areas!

DECISION POINTS

1. How should natural and cultural resources be managed to optimize the preservation of both?

Climbing is a cultural and historic use of the park.

The plan shows no analysis or understanding of rock climbing as a cultural and historic use of the park. Climbing has taken place in the park for over 80 years since about the 1920s and 1930s. This use is well-documented in the archives of the Potomac Appalachian Trail Club in Vienna, Virginia and the history of climbing in the two editions of the Great Falls Climbing guidebooks published by PATC (The plan lists PATC as a contact organization in the appendix to the plan). The plan contains no information that would indicate that climbing has become other than a positive presence in the park. It demonstrates nothing that would indicate climbing has become an issue of impacting resources in the park.

Rare plant species.

Concerning any rare plant species, the plan should recognize that these plants obviously still exist in the park even after nearly a century of climbing. Therefore climbing in the past century has not harmed these plants and certainly has not stamped them out. Moreover, these plants are apparently found in abundance in Maryland and other parts of Virginia. This fact should be balanced against the important cultural heritage of rock climbing. The rock climbing in Mather Gorge is unique and cannot be performed elsewhere. However, the rare plants at issue can grow profusely elsewhere in the region. To restrict rock climbing because of this localized rare plant

issue would choose rare plants over a balanced view of the recreational and cultural mandates of the park. This park is not under the jurisdiction of the Wilderness Act. Rock climbing should outweigh the plant conservation in this situation.

Moreover, the plan presents no evidence that climbers and climbing activities are responsible for any detrimental effects on rare plant species. Indeed, the scientific studies cited in the plan are old and outdated. In some cases, public and non-public versions of scientific reports apparently exist. Climbers have been denied access to review all such reports. The information presented in the plan is not an adequate basis for drastically curtailing a cultural and history recreational activity such as rock climbing.

Even to the extent that the any plants need temporary protection for re-growth, the NPS should work with climbing organizations to work on a plan that is precisely tailored to temporarily restrict climbing in certain specific locations and certain specific times. Climbers are responsible stewards of the environment and would respect any valid temporary and narrowly tailored action to avoid damage to specific, documented damage to natural resources. Climbers and their organizations would respect this situation, as they have at many other climbing areas in this country for various birds to the extent such restrictions have been documented. The plan, however, implies that closure is the only means of protecting certain biological resources. Other means may be entirely feasible to protect such resources, however. Any blanket and permanent closures unrelated or not tailored to specific plant locations is not a reasonable action by the NPS. Such a broad and punitive action would border on an abuse of discretion by the agency.

Trees are good anchors and do not harm the environment

Setting up anchors on trees for rock climbing is an acceptable method which does not harm trees. To my knowledge, there are no valid scientific studies which demonstrate that rock climbing anchors and ropes holding no more than body weight place undue stress on trees (top-roping is standard practice in this park). The NPS as well as other governmental agencies are now required by statutes and regulations to follow a data quality mandate for any regulations, studies or impact statements. Thus, if the NPS were to choose any alternatives that would adversely affect climber's ability to set up anchors on trees, rocks or vegetation, the NPS would have to base its decision on sound science of a type which would meet legal data quality requirements.

The only alternatives to tree anchors are anchors set up with removable chock nuts as protection or bolt anchors. However, bolt anchors are unnecessary at Great Falls in light of the more natural tree anchors. Any consideration of installation of bolt anchors raises a separate set of issues. If bolt anchors were contemplated for permanent installation, the NPS and local climbing organizations should thoroughly discuss relevant issues and reach a consensus with other interested parties before making permanent decisions. In any case, bolt anchors should not be used to define hundreds of climbs (see comment on definition of climbs in recreation section below).

Climber organizations are responsible stewards of the environment

Regardless of which alternative is chosen to preserve natural and cultural resources, the NPS should recognize that nonprofit recreational groups have cooperated dozens of times over the years with the NPS to preserve such natural and cultural resources. In particular, the local nonprofit rock climbing organizations referred to below have participated in cleanup days and other service activities. These organizations as well as their individual members are environmentally conscious and are continually conducting educational programs for themselves and others in order to be protective of natural and cultural resources. In particular, these organizations and their members generally take steps to make sure that trees and vegetation are protected and leave no trace of use.

2. What are the most appropriate levels of service and locations for visitor interpretation and education in the park?

Educational and interpretive activities should make available knowledge in the visitor center and elsewhere about rock climbing, hiking, and mountaineering and their cultural and historical uses in the park. The current climbing bulletin board is useful and should be maintained if not expanded. In general, extensive use of bulletin boards are low cost and would benefit all users of the park, including the general public and recreational users. Better signage is needed throughout the park for trails, recreational activities and services.

Expansion of restroom facilities is a good idea considering the large geographical area of the park. Another issue is the seasonal closure of restrooms. I have often found the restrooms to be locked particularly in the spring and fall seasons. I believe they should be open all year and not be locked. When the park is open, the restrooms should be open for environmental reasons. Moreover, the current restrooms are not kept in good repair. In fact, they emit odors inconsistent with first world country bathrooms (I just return from traveling and climbing in China).

To the extent that any permits for climbing would eventually be required, appropriate levels of service would need to be provided for climbers, including appropriate hours, and personnel knowledgeable about climbing. Budgeted funds for additional personnel each year would be needed. However, as stated below, the plan provides no adequate justification to require permits. If permits were required, the NPS should reach a consensus with rock climbers to require an appropriate level of service such as locations, budgets, hours, and climbing knowledge and training.

3. What are the appropriate levels and locations of recreational activities such as picnicking, kayaking, dog walking, biking, horseback riding, climbing and boating in the park?

Encourage exercise.

The plan should recognize the appropriateness of climbing as an experience, as a source of healthy exercise and as an expression of personal freedom. The plan currently ignores the benefits of climbing and only focuses on possible adverse effects of climbing.

If anything, expansion of climbing sites should be encouraged. Climbing is a historic recreational use; it is healthy exercise; and it is a long-time passion of many citizens. Climbing takes place in many national parks and forests and in state and local parks. It is a legitimate use of public lands and should not be denigrated in the plan without significant justification. In spite of attracting many local, national and international visitors, climbing remains a small sport and climbers are only a tiny percentage of park users. Climbers have always been an independent community that has successfully self-regulated itself. Climbers and their organizations regularly give back efforts to the park as volunteers in many ways. As in Alternative A, with modifications for Microdome, Flat Iron and Sand Box, climbing activities should continue to be allowed at without restriction.

Alternative B is not acceptable because it would reduce the number of climbing sites and would control those sites through NPS permitting. The plan presents no evidence of overuse or that rock climbing is injuring any resources either required to be protected by statute or by NPS policy. The plan ignores the pre-existing practice of rock climbing before formation of the park. To take the drastic action of removing current and historical recreational opportunities is not supported by any evidence and should not be considered as a permissible or rational alternative. The plan's proposal to limit climbing is not narrowly tailored to any proven resource issues.

Rock climbing in Great Falls National Park is unique.

The climbing in the park is unique and is the best climbing within hours of the Washington DC area. The park is a national and international resource for climbing. Pushing climbers out of the park to climb at other National Parks is counterproductive and just transfers issues to another park. The distances to similar high-quality climbing can be 2-3 hours away. The Great Falls Park, located in a major metropolitan area, serves millions of people; it has restroom facilities, easy access for rescues and is better suited to handle climber traffic than many other areas. Putting climbers on the road and closing off the unique and historic climbing in the park does not properly implement the purpose of the national park system. It is unfair to local citizens who have a right and expectation of using their local national park for recreation.

The experience of climbing on the specific climbs at Great Falls is unique. Not all rocks are the same and attempting to designate specific climbs and pick and choose between the climbs would denigrate the entire climbing experience. Climbers are a small group of users and account for a small impact on the park compared with the hikers and casual visitors. Climbers often work intensively on a particular climb; they train for that climb and try it many times. From personal experience, my partner and I worked on "Middle of the Road" most of one summer before we succeeded in climbing it without a fall. It is great exercise and recreation to climb in such a beautiful area.

Microdome should not be closed.

The plan should not propose closing or limiting access to the Microdome climbing area, also known as Little Half Dome after its namesake in Yosemite National Park. As stated above, specific climbs are unique. The Microdome area is one of the most historical and unique areas

contract out to hire concessionaires to administer a permit system, this would be an additional expense and waste of taxpayer's money.

Such a permit system would derogate the long history of use by local nonprofit recreational and environmental clubs and organizations. Permits cost money to administer and are unnecessary here. Rock climbing activities are currently successfully being undertaken without the need for regulation. There is no demonstrated need for any formalization of climbing procedures including reservations, registration, or permits and associated administrative costs involved in a new system.

To the extent that permits were to be implemented for Gorky Park, Microdome and the Flat Iron, those permits should be available routinely and conveniently on the day of climbing without requiring any advance reservations or notification or escorts by the NPS. Moreover, sufficient annual budget money for additional personnel salaries and administrative costs would need to be provided to implement such permits.

Climbing Management Plan

Development of a Climbing Management Plan is unnecessary because climbers have been responsibly self-regulating themselves for near a century with minimal impact on the park's natural or administrative resources. Indeed, climbing is a cultural and historic activity that the plan should recognize. Climbers constitute a small percentage of the park's visitors. Nothing in the plan would justify singling out climbers for development of a Climbing Management Plan and additional regulation.

To the extent that a Climbing Management Plan were ultimately decided to be developed, details for climbing policies and procedures should be set forth in the Climbing Management Plan, not in the GMP/EIS. There is no need for implementing actions and details to be set forth in this plan. This plan should be a high level document and implementing details should be left for the NPS and climber organization to develop in the Climbing Management Plan. The details of legal procedures and process for preparation of a Climbing Management Plan should be spelled out and formally committed to in the final GMP/EIS or in a Memorandum of Understanding.

If a Climbing Management Plan is developed, it should indicate any policies, if any, on anchors, either bolted or on trees or natural anchors. It should provide that a permit is not required to climb at Great Fall. In any circumstances where temporary closures may be necessary for proven substantive reasons, the Climbing Management Plan should set forth any implementing details and procedures before such closure actions are implemented. In any case, it would not be acceptable for this plan or any Climbing Management Plan to provide for unilateral closures in the sole discretion of the National Park Service. If a cliff or climb were under consideration for closure for any natural resource reason, valid scientific studies must be required to demonstrate the need for consideration of such closures. The requirement for such scientific evidence should be set forth in the Climbing Management Plan, and meet any requirements of federal statutes for quality scientific information to support federal actions.

Rescue and emergency response operations

Rescue and emergency response operations continue to be needed in the park. Where permitted, the rock climbing community has for many years provided valuable assistance to rescue operations that have occurred in the park for boaters, hikers, fisherpeople, the general public, and climbers. In some situations, however, assistance by climbers has not been allowed, which and has led to some delays. Indeed, climbers have a superior technical ability to assist in rescues that might be necessary. Over the years, climbers have assisted local first responder units to the legal extent permitted who are unable to cope with technical issues involved with stranded or injured people on or near the cliffs. Many climbers have emergency training and most have extensive knowledge of anchors, knots, ropes and other equipment necessary to help in rescue and emergency operations. The NPS should recognize and encourage the climbing community's resources in this area in planning their own training programs for federal personnel and in working with other federal, state and local emergency response organizations. The plan does indeed recognize that visitors who participate in technical sports such as climbing are not among those generally needing rescue.

4. How should trails be managed with regard to use, connections to trails outside the park, and locations?

Social trails to the climbs should remain open for several reasons. First, they are necessary to access the climbs. Second, climbers are gentle on the trails. When leaving the marked trails to set up the anchor for a climb, climbers generally approach the edge of the cliff on top of rocks or on very narrow short side trails. Especially when wearing climbing shoes, climbers walk almost exclusively on rocks to avoid getting dirt and sand in their climbing shoe soles. There is no reason not to recognize short climber social trails. To the extent that social trails are causing damage, the NPS should document whether this is caused by climbers or by other trail users. Again, climbers are a small number of park visitors. The NPS has shown no evidence to the contrary.

Any decisions to close social trails to the cliffs should be made on a case-by-case basis after consulting with climber user groups according to procedures that should be set forth in a Climbing Management Plan, if any is adopted. If any paths to access climbing areas are proven to be unacceptable social trails, then such trails could be rerouted to minimize any sources of visual impacts as long as access to a particular climbing area remains possible. It would not be acceptable to close access to climbing areas by closing existing trails without providing alternative access routes to the cliffs.

Concerning general trails, the NPS should strive to connect trails with trails outside the park so that enhanced hiking and biking opportunities would be available. Bicycle and hiking access to the park should be encouraged to help alleviate traffic and parking problems. Currently, it is quite difficult to get into the park by bicycle. A separate bike lane and hiking trail should be added to the entrance road as well as adding access from other nearby parks.

5. How should traffic and associated elements (parking spaces, time limits, etc) be

managed?

The park should organize its personnel to more efficiently process public entrance into the park. Since most climbers, paddlers and other recreational users have yearly passes, I would encourage special lanes to recognize the yearly passes. Moreover, the park should save money and paper by asking whether the patron needs a map rather than automatically handing out maps to everyone. I would encourage the NPS to provide some type of notification at the entrance to the park on Old Dominion Road concerning whether the parking lots are full and the length of the wait to get into the park. This would also save gasoline from cars waiting in line.

Overflow parking should be provided and encouraged. Individuals who have yearly passes, such as climbers, could be encouraged to enter the park on trails such as from Difficult Run. In peak fall and spring seasons, climbers sometimes park outside the park to avoid lines and crowded parking lots or just avoid the peak times in general. In general, connections from and to other parks and parking lots should be encouraged. This relates both to individual climbers and to club outings of non-profit climbing groups. Commercial rockclimbing concessionaires may have their own parking concerns.

Bus service should also be encouraged. As an active member and former officer of various climbing organizations below, I have often received calls from climbers and mountaineers who have just moved to Washington and would like to climb locally (particularly personnel from foreign embassies). Lack of bus service impacts climbers who would like to go to the park from downtown DC or other urban locations without using a car. In addition, the picnic facilities are used by many immigrant groups who might benefit from bus service. The park should be less car dependent and more accessible from the outside by bike, foot, and bus. The NPS should work with local companies and governments to provide bus service.

The NPS should start or intensify its dialogue with other relevant federal, state and local governments on such cross-cutting issues as bus transportation, roads, traffic, signage, maps, and emergency response and rescue.

6. What are the most appropriate locations to support administration and operation functions with respect to minimizing resource disturbance?

Administration and operation functions should be located out of sight of the general public as much as possible. The current location of the maintenance facility near the restrooms is somewhat unsightly and should be moved if possible.

Administration and operations should ensure that park personnel and concession operations are knowledgeable about recreational activities. In particular, they should be able to provide climbing information as well as information about other recreations such as riding, biking, boating.

7. Other

Comments on documents, procedures etc

I object to your action, taken without sufficient justification, of preparing and withholding a non-public version of information involving natural resources. This withholding of information makes it difficult if not impossible to comment on certain issues such as rare plant species.

Some references in the draft GMP/EIS are incorrect. For example, footnote 1 in section 3.1.2 *Visitation and Visitor Activities*, purports to support the statement that Great Falls Park received 425,290 visitors in 2004. That document from the NPS Use Statistics Office contains no such reference to Great Falls National Park.

List of Non-Profit rock Climbing Clubs Climbing at Great Falls

In general, members of the various nonprofit rock climbing, hiking, and mountaineering organizations often climb at the park. Following is a description of each organization:

1. **The American Alpine Club (AAC)** is a national non-profit organization that has represented mountaineers and rock climbers for over a century since its inception in 1902. <http://www.americanalpineclub.org/>. The **Blue Ridge Section (BRS)** is the local climbing club of this national organization, which covers Washington DC, Maryland, Virginia, West Virginia, and Delaware. Most of the Blue Ridge Section's approximately 300 members live in the D.C. area and use Great Falls Park for recreational use including rock climbing and practice for mountaineering trips. The members have been climbing on the rock cliffs in this area including Great Falls on both the Virginia and Maryland sides, in many cases, longer than this area has even been a national park. This plan will have a significant effect on the experience of the members of the American Alpine Club, <http://brs.alpineclub.org>.
2. **The Potomac Appalachian Trail Club (PATC)** is a volunteer trails organization with a membership of over 7,000 headquartered in Vienna, Virginia. The main purpose of PATC is the upkeep and improvement of nearly 1,000 miles of hiking trails, 30 shelters, and 28 cabins in Virginia, Maryland, West Virginia, Pennsylvania, and the District of Columbia, <http://www.patc.net/index.htm>. The **Mountaineering Section (MS)** of PATC has about 200 members who rock climb, ice climb, hike, go mountaineering and perform other services for the outdoors community, http://www.patc.net/chapters/min_sec/.
3. **Shedlimbs Inc.** is a national grassroots, non-profit organization dedicated to promoting a strong female presence in the climbing community. It supports active, self-reliant participation of women and girls in the sport of climbing and encourages a spirit of volunteerism, mentoring, and environmental responsibility. Members of the local **Washington DC** chapter often rock climb at Great Falls National Park, <http://www.shedlimbs.org>.

Summary

I have been a rock climber for 23 years, and have climbed in China, Nepal, Peru, Canada, Mexico, Thailand, most countries in Europe, and most major climbing areas in the United States.

I am a member of the rock climbing groups listed above. I was Chairperson of the PATC/MS in 1989, Chairperson of the AAC/BRS from 1999-2003, and am a lawyer retired from practicing energy law in Washington, D.C. I hope you will seriously consider the issues I have raised concerning the provisions of the draft plan. In climbing in all of these locations, I have never had to have a permit to rock climb and have never encountered the level of restrictions proposed in this plan.

Please consider these comments in issuing the final GMP/EIS and the Record of Decision. I encourage you to please select the No-Action Alternative A. 1 and other rock climbers will be personally affected by the plan and we have a common desire to work together to maintain the park to make its natural and cultural resources available to a wide variety of uses befitting its location in a major metropolitan area. It is important that climber access to the rock cliffs not be crippled by unwarranted blanket restrictions.

Sincerely,

Jeanette Helfrich

cc:

United States Senator Paul Sarbanes
United States Senator John W. Warner
United States Senator George Allen
United States Representative Steny Hoyer
United States Representative Frank R. Wolf

United States Senator Barbara Mikulski

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Furthermore, the GMP/EIS references the establishment of a Climbing Management Plan ("CMP") that could potentially restrict some climbing areas, establish a permitting

process for the climbing areas that are not restricted, and would require the establishment of permanent climbing anchors in some areas. The GMP/EIS, however, does not explain how this CMP would operate, how the NPS would regulate access to various climbing areas, or who would be responsible for establishing, erecting, and maintaining any such anchors. It also appears that the NPS has not thought through the organizational and budgetary impact of this proposed plan, as it was not clear from the GMP/EIS how the NPS intended to control access, or whether any permitting or access-control system would even work. For example, the administrative burden for regulating the climbing areas alone would be immense. There are approximately 200 "named" climbs along the Potomac cliffs inside GFNP, and some climbs share common anchors. Under any permitting scheme, the NPS would have to regulate access by somehow assigning a particular climb to a particular person or group on a daily basis.

Finally, the NPS would presumably have to restrict or prohibit access to a particular climb or area using what are the commonly recognized climbing guides, e.g., "no climbing in the Dihedrals between Lichen Wall and The Roll"¹ in order to ensure the climbing community understood the scope of any proposed restrictions. This would place the NPS in the awkward position of having to explicitly acknowledge clear evidence of the long-standing and well-established practice of local climbing at GFNP as a tool in restricting what has now somehow become a destructive and disruptive activity.

Sincerely,



Kurt D. Ferstl

cc: Congressman Jim Moran 5115 Franconia Road, Suite B Alexandria, VA 22310 (703) 922-9436 fax	Congressman Frank Wolk 13873 Park Center Rd Ste. 130 Herndon, VA 20171 (703) 709-5802 fax
Senator George Allen Russell Senate Office Bldg. Room 204 Washington, DC 20510 (202) 224-5432 fax	Senator John Warner 225 Russell Building Washington, D.C. 20510 (202) 224-6295 fax
Governor Mark R. Warner Patrick Henry Building, 3rd Floor 1111 East Broad Street Richmond, VA 23219	Delegate-Elect David Bulova 37 th District PO Box 106 Fairfax Station, VA 22309

¹ See Climbers' Guide to the Great Falls of the Potomac, June 1985, 1st ed. at page 19-20/23. Among the only commonly recognized documents that identify these climbs are the guide books published by the Potomac Appalachian Trail Club ("PATC") Mountaineering Section. These guide books, in their most recent editions, reference earlier local PATC and other publications describing climbing activity going back at least 60 years.

POTOMAC HERITAGE TRAIL ASSOCIATION

September 9, 2005

Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Re: Great Falls Park, Virginia
Draft General Management Plan

Dear Superintendent Calhoun:

The Potomac Heritage Trail Association has reviewed the above-referenced Draft General Management Plan for Great Falls Park, Virginia, and would like to commend you for the significant advances in the plan since the beginning of the process in 2002.

Given our primary concern for the routing of the Potomac Heritage National Scenic Trail within the Park, we are extremely appreciative that the Trail route has been removed from Old Dominion Drive and located on existing Park trails. However, there are still improvements to be made within the routing plan.

As the trail contains within its title the terms "Potomac", "Heritage" and "Scenic", it would be much more appropriate that the trail route from the south follow the Ridge Trail only as far as the junction with the River Trail, then follow the latter past Cow Hoof Rock, Sandy Landing, the lower locks of the Potomack Canal and the magnificent views of Mather Gorge. The route indicated on Figure 2.2 along the Old Carriage Road lacks any views whatever of the Potomac River or of any portion of the canal and is singularly devoid of any of the attributes associated with the name of the Potomac Heritage National Scenic Trail.

Nevertheless, it would make sense to provide an equestrian and bicycling alternative to the PHNST along the Carriage Road, past the Visitor Center and exiting the Park along the Fire Road. This solution would therefore designate a primary hiking route of the PHNST along the Difficult Run Trail, the Ridge Trail, the River Trail and the North River Trail, and designate also a PHNST equestrian and cycling route along the Difficult Run Trail, the Ridge Trail, the Old Carriage Road and the Fire Road.

118 Park St. SE
Vienna, VA 22180
571-436-7801
frfranke@potomacrail.org


Our proposal has the advantage of providing a hiking route for the PHNST along the most significantly scenic and historic trails within the Park, while also providing an official route appropriate for our equestrian and cycling partners. The Potomac Heritage Trail Association has as one of its primary goals the accommodation of multiple types of users along the PHNST corridor whenever possible and appropriate; we are indeed fortunate that Great Falls Park has trails appropriate for all user groups along two designated routes for the Potomac Heritage National Scenic Trail within Great Falls Park - one for hikers and the other for equestrians and cyclists.

Please do not hesitate to contact me should you or your staff wish to discuss further any aspect of our proposal.

Yours very truly,



Ric Francke
Executive Director

 "Melly Hickman"
 To: GWWP_superintendent@ops.gov
 cc: mhickman@cox.net
 Subject: ATTN: Great Falls GMP Team
 09/14/2005 07:05 PM
 AST

Great Falls Equestrian Society
 9111 Mine Run Drive
 Great Falls, Virginia 22066

September 14, 2005

Audrey F. Calhoun, Superintendent
 George Washington Memorial Parkway
 c/o Turkey Run Park
 McLean, Virginia 22101

Attention: Great Falls GMP Team

Dear Superintendent Calhoun:

I am writing on behalf of the Great Falls Equestrian Society which represents horse owners and riders in the Great Falls/Northern Fairfax County area. Our main goals are to 1) promote a horse-friendly environment in the Great Falls area and 2) preserve, develop and maintain riding trails in the Great Falls/Northern Fairfax County area.

We are pleased that horseback riding is now considered an important park activity and that horses will not be excluded from the Park. Most Park visitors, especially children, delight in seeing horses in the Park.

Many of our members have worked diligently for many years to preserve and develop multi-use trails. In the early nineties, the Great Falls Equestrian Society raised funds and donated a vehicle to Great Falls Park specifically designed for trail maintenance work.

Great Falls Park is a prime destination point and the nexus of other trail systems. Our members support the proposals to connect the Great Falls Park trails to the Cross County and Potomac Heritage Trails and the Georgetown Pike Trails.

Both Alternatives for the Park provide for developing a Trail Management Plan which we support, but many members are concerned about vague references to "elimination of social trails." The Plan does not provide enough specifics for our members to evaluate this proposal. We are concerned about the loss of any existing trails, although we support efforts to re-route and upgrade the trail system.

The Plan proposes a zone system for various activities within the Park. These zones should be sufficient to protect the Park's cultural and fragile resources. Most of the trails used by equestrians are already located in what is called the natural zone. We believe that improved signage on trails and an improved trail system will eliminate any concerns that horses will damage the Park's historical assets. Riders prefer to stay on trails with good footing and will only venture off when confused about directions or when faced with obstacles or poor footing.

Our group is ready to meet with park staff to devise appropriate solutions to any specific problems that the Park believes are created by horses.

The Management Plan implies that horses are damaging resources within the Park, but does not provide enough specifics for us to address the issue. We believe most trail erosion is caused by heavy rain -- not horses or bikes.

Alternative B proposes permits for horseback riding. Some members supported this proposal but others questioned its usefulness. Proponents believed that permits would enable the Park to better educate riders on proper use of trails. Opponents believed that permits would be burdensome to the Park and riders and produce few benefits that cannot be achieved through simpler means.

All members support upgrading and enhancing the current trail system. Any urban park is going to have heavy wear on its trails and needs ongoing maintenance. We believe maintenance can be reduced, however, by investing in quality materials and using the best trail construction techniques.

Some specific suggestions follow:

- Improve trail signage to identify the type of uses allowed, the destination of the trail, and its distance.
- Establish circuit trails of varying lengths. For example, the Carriage Road is an excellent trail on high ground with a sturdy surface, but it dead ends. This trail should be extended into a loop and connected to the Fairfax Cross County Trail near Georgetown Pike.
- Install erosion bars across all the trails on slopes
- Re-route trails away from sensitive areas or heavily populated areas, such as the picnic area. May be there should be a different map for the horse and bike riders.
- Provide better trail maps to visitors based on the activity. Bull Run Park, for example, provides horseback riders and bikers with different maps.
- Locate proposed new trails along Georgetown Pike and Old Dominion sufficiently away from the roads to preserve the Park experience.
- Consider adding a watering facility for horses. For example, there is an area near the Old Mine Ridge Trail where riders allow their horses to drink. Permanent access to water could be arranged there by placing a small watering trough on the main trail where it crosses the stream. An old-fashioned hand pump could be installed to bring water just a few yards from the stream to fill the trough.
- Allow "social" or "neighborhood" trails to remain, but mark them to indicate they dead-end at private property. These trails are used primarily by people who live near the Park. Neighboring property owners reap both the benefits and the inconveniences of

living near a popular public park. We recommend that the Park establish a "good neighbor" policy and allow people to enter the park through their own property. This will also reserve more parking spaces for those who have to travel to reach the park. Horse trailers in particular take up several spaces.

Thank you for the opportunity to comment on the Great Falls Management Plan/Environmental Impact Statement. Members of our group are available to meet at your convenience to discuss any issues related to horse usage in the Park and to assist the park in designing and maintaining trails suitable for horses. Please call me on 703-759-1952, if we can be of assistance.

Sincerely,

Molly Hockman, Chair
Great Falls Equestrian Society



GF Final plan comments.doc

Ozana Halik
Chairman, Mountaineering Section
Potomac Appalachian Mountain Club
PO Box 16377, Alexandria VA 22302

September 15 2005

Audrey F. Calhoun
Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

Dear Ms Calhoun

I am writing to you on behalf of three of the local DCVA/MD climbing clubs: the Mountaineering Section of the Potomac Appalachian Trail Club (PATC), the Blue Ridge Section of the American Alpine Club, and the local chapter of Sheddlimbs, a women's national climbing group. These three organizations have a combined membership of roughly 400 climbers in the VA/MD/DC region.

We appreciate the opportunity to comment on the recently released GMP/EIS for Great Falls Park, VA. We will be submitting a formal joint response following the public meeting this Saturday, September 17.

We are contacting you in advance to express our concern on the lack of detail provided in the draft plan where addressing the future of rock climbing in the park. Specifically, the plan refers to the possibility of closing certain areas to rock climbing, the installation of permanent anchors and the introduction of a permit system. These are identified as important components of the preferred scheme.

We have reviewed the GMP/EIS in detail and have developed a list of questions and concerns that we feel have been overlooked, or are simply not addressed in the current draft. These questions are listed in a separate attachment sent with this email.

We expect a significant number of climbers to attend the public meeting on September 17th. We are conscious of the limited time available at the meeting for the NPS to respond to all public concerns, not just climbing, and we recognize that our list of questions is extensive. For this reason, we suggest that a more effective approach might be for the NPS to meet separately with a small group of representatives from the local climbing clubs regarding our concerns. We are available to meet with the appropriate NPS staff either later this week or next week if that is more convenient.

I would like to emphasize that if a Climbing Management Plan is to be produced then the local climbing clubs would like to assist the NPS in developing such a plan, given the significance of this to our members. We recognize in this that the NPS is expected to

meet multiple objectives, and that these are often somewhat contradictory. Nonetheless, the public meeting may be our only opportunity to discuss these important issues with the NPS, and we have indicated this to our membership. For this reason, I would appreciate a response to our request before the meeting on Saturday. We will then be able to inform our members attending the public meeting as to whether we will have an opportunity outside of the meeting to clarify NPS plans.

I have sent this letter by email as well as by ordinary mail. I would appreciate it if you can confirm that you have received this email.

I can be reached at greatfallsaccess@gmail.com, or via cellphone - (703) 618-1202.

Ozana Halik

Cc

Simon Carr, Chairman Blue Ridge Section, American Alpine Club
Wendie White, Coordinator, DC/Baltimore Chapter, Sheddlimbs

Management Plan for Great Falls – Questions

15 Sep 2004

Background

The NPS has recently released a draft GMP/EIS (General Management Plan/Environmental Impact Statement) for Great Falls Park, Virginia.

The plan affects a number of different recreational users of the park, but based on the details provided, is potentially a significant threat to rock climbing at Great Falls:

- NPS GMP/EIS describes two alternatives:
 - "No changes" strategy
 - A preferred strategy with impacts in particular for climbers
- At an extreme, the preferred alternative contains provisions that could effectively eliminate casual/recreational climbing
- Even the "no changes" alternative will lead to restrictions on climbing at the Sandbox and could lead to the closure of climbing areas such as the Microdome and Cigar Box
- There are few real details in the document so it is difficult to judge the impact

In an effort to better understand the NPS plans, we have prepared a list of questions based on reading the GMP/EIS. These questions reflect a canvassing of opinion among the members of the Blue Ridge Section of the American Alpine Club, the Potomac Mountaineering Club, Steelclimbs and local unaffiliated climbers.

These questions are being submitted to the NPS in advance of the Public Meeting at Great Falls on September 17, 2005, so that the NPS will have the opportunity to prepare a response.

Please note this does not constitute a formal response to the GMP/EIS by the Clubs involved in the preparation of this document; a written response will be submitted following the September 17th public meeting. This document simply requests additional information.

Contacts

If you have any questions about this document, please contact:

Ozana Hatik or Vince Penoso, Mountaineering Section,
Potomac Appalachian Mountain Club, PO Box 16377, Alexandria VA 22302
or (preferably by email) at greatfallsaccess@gmail.com

Closure of Areas

The draft GMP/EIS indicates that the rationale for proposing the closure of areas currently used for rockclimbing is the protection of rare species. The information provided in the NPS plan does not clarify what would be required to provide adequate protection, and we are unable to evaluate the impact closures would have on rockclimbing.

Questions

- Which specific areas (named cliffs, routes, or complete areas of the Mather Gorge) will be closed under the two alternatives?
- What evidence is there of climber-related damage to the specific areas under consideration for closure? What evidence is there that climber-related use of Great Falls in general has led to any of the more general problems implied in the GMP/EIS? How much of this is a consequence of access to the cliffs by all user groups, not just climbers?
- What would be protected by closure – i.e. not just name of specific resources, but location of the resource i.e. access path/terraces/actual rock face?
- Is restricting access to climbing routes only by rappel, a method of reducing impact on cliffs? Has the NPS considered alternatives other than blanket closures? Can areas be protected by more targeted means similar to those used in peregrine falcon protection – i.e. specific routes?
- Why are the large areas not currently frequented by climbers (there are many) not adequate protection for rare species believed to be at risk?

Permits

The GMP/EIS proposes that under the preferred alternative permits would be needed for rockclimbing.

In the GMP/EIS, the reasons for needing a permit system are not given, and there are no details as to how a permit system would operate. It is consequently difficult to comment on either the rationale or mechanics of a permit system.

Questions

- Are permits intended to simply reduce climber numbers, or is there a perceived safety aspect as well?
- If there is a safety aspect, how will increased safety be implemented? What tests would be used to issue permits? Who would implement the tests? How often? Where?
- If permits are intended for access control, i.e., as a quota, how would this quota be determined? Would permits be for a day or a shorter period? Would permits be for individual routes? Would permits be reissued during the day if someone leaves?
- How will permits be issued/checked? Will there be a fee, in addition to the usual entry charge? What resources does the NPS have to implementing a permit system, both administratively and in terms of enforcement? For example, would there be by rangers at the top of the cliffs?
- There seems to be the possibility of permit capture by commercial groups which will eliminate recreational access. Would commercial groups be included/excluded from any permitting system/quotas?

Anchors

The GMP/EIS also proposes the installation of permanent anchors. The reasons for this policy are not given, and there are no details as to how a permanent anchor scheme would operate.

Questions

- What is the principal rationale for anchors? Are anchors for protection of trees/other resources or for "safety"?
- What type of anchors? (Bolts, chains....?)
- How many anchors, what spacing, what areas?
- If bolts, would they be located at edge of cliff (safety concern) or back from edge?
- Are climbers to be required to use the permanent anchors only – e.g. no use of anchors constructed with rockclimbing hardware, and/or no use of trees (including protective wraps around trees)?
- Will available routes be limited to one or two directly under the permanent anchors, with routes to the side not permitted, if anchors are not installed above all routes?
- Would anchors be shared by different climbers?
- Would commercial groups have preferential use of anchors?
- Who takes responsibility for proper installation and maintenance of anchors?



Maryland District of Columbia Chapter

5410 Grosvenor Lane, Suite 100, Bethesda, Maryland 20814
301 897-8570 fax: 301 897-0858

November 16, 2005

Deputy Superintendent Jon James
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Dear Mr. James:

We appreciate the opportunity to comment on the Draft General Management Plan (GMP)/Environmental Impact Statement for Great Falls Park. We recently re-discovered that The Nature Conservancy was instrumental in helping to secure the protection of Great Falls Park back in 1956. Since 1996, the Conservancy has also been the co-owner of Bear Island, a 90-acre stretch of land across Mather Gorge with extensive views of Great Falls Park. The 50th anniversary of our involvement in Great Falls Park land protection seems an appropriate time to comment on the GMP that will shape its management for the next 10 to 15 years.

Since 1999, The Nature Conservancy has been collaborating with The National Park Service on the development and implementation of a Site Conservation Plan (SCP) for the Potomac Gorge, the broader 15-mile river corridor from Great Falls to Key Bridge. This partnership was driven by the exceptional conservation importance of the Gorge, where more than 200 rare species and natural communities have been recorded.

We commend the staff of the Parkway and Great Falls Park on preparing a draft GMP that is compatible with many of the findings and recommendations of the Potomac Gorge Site Conservation Plan. This Plan was completed in 2001, the result of a year and half of effort involving Park staff from GWMP, C&O Canal National Historical Park, and the National Capital Region Center for Urban Ecology. The Plan drew on more than 200 publications and input from 30 subject matter experts. The result of this analysis was a comprehensive conservation plan identifying the priority natural resources for protection in the Gorge: their ecological health or viability, threats to their survival, and strategies needed to safeguard them.

Specifically, both Alternative A (Continuation of Current Conditions) and Alternative B (Preferred Alternative) include some important actions to protect the Park's significant natural resources. We support most of Alternative B's new actions to protect natural and cultural resources, but have some concerns with a few aspects of what's included (or excluded from consideration) in Alternative B (as noted below).

The Potomac Gorge Site Conservation Plan flagged insensitive public recreational use practices as a stress to the Park's rare species and natural communities. We support the creation of a new Trail Management Plan and a new Climbing Management Plan, both of which should involve extensive consultation with and input from recreational user groups. Alternative B's recommendation to inventory and assess the Park's formal and informal trail network, and to close most social (unofficial) trails is greatly needed. This will require allocation of resources to carry out and maintain needed trail closure, interpretive signage, public education, and

International Headquarters: Arlington, Virginia 22203 / 606 • 703 841-5300
nov16.pdf

enforcement. Since some social trails originate from surrounding private lands, it will be necessary to work with the Park's neighbors to inform them that social trail closure is not for entry fee recovery purposes, but rather for ecological reasons (i.e., habitat fragmentation, spread of invasive species). We expect that Jeff Marion's upcoming study of recreational use impacts on natural resources at Great Falls Park will yield valuable recommendations to achieve these management objectives.

Although the action included in both Alternatives to close three climbs met with concern from the climbing community, we support this measure to protect the globally rare scoured prairie natural communities that must be traversed to access those climbs. This rare habitat is found in five or fewer places in the country, and should be afforded the highest level of protection. We understand that the closure of these three climbs would in fact affect only 27 of the 201 (or 13%) of the Park's climbing routes, and that these three climbs are less popular and less heavily used than others in the Park.

Under Alternative B, we support rehabilitation of the Visitor Center to improve exhibits and include greater levels of resource interpretation. We commend the Park for maintaining the one-car in, one-car out policy, for not creating any new parking areas, and for not constructing a new public vehicle access point. Using the Park as a demonstration area for mitigating storm water runoff is a fine idea, and having the Park provide technical assistance to neighbors on water resource management would help protect Park and Potomac River resources. If the scope and mandate of a GMP allows it, we would like to suggest that the Park consider additional outreach to the surrounding landowners to address some other stresses to Park resources that come from outside the Park's boundaries, such as invasive species. Specifically, we would like to recommend that the Park use the "Good Neighbor Handbook: Tips and Tools for River-Friendly Living in the Middle Potomac" (nature.org/goodneighbor) developed by the Potomac Conservancy and The Nature Conservancy in a mailing to landowners adjacent to the Park. The two Conservancies would also be happy to give a presentation on the handbook's recommendations at the Great Falls auditorium to share information with Park visitors and surrounding landowners.

We also must mention the two actions in Alternative B which raised our concern: the construction of two new facilities, and the issue of connecting with other regional trail systems. When our Potomac Gorge project director attended the Great Falls GMP public meeting on September 17, the EDAP contractors told her that only the new U.S. Park Police horse facility would have a new development footprint impact, since the new administration building would be built on the footprint of the old maintenance building. The construction and use of a new on-site Park Police horse facility is likely to promote the invasion and spread of non-native plant species. If the facility must be moved on-site, it should be constructed in already cleared areas, avoiding the loss of additional forestland, and the contractors should use best management practices to minimize surrounding forest habitat disturbance and prevent the spread of invasive species. The GMP also mentions that there will be "construction of trail segments" for the Cross County Trail, Potomac Heritage National Scenic Trail, and Georgetown Pike Trail (Executive Summary p. 7). When our Potomac Gorge project director asked the EDAP contractors about this, she was told that there would be no new trail construction or trail expansion to connect with these trails. Development of new trail segments in Great Falls Park should be avoided, since formal trails cause habitat fragmentation, lead to social trail proliferation, and create corridors for the spread of invasive species.

On that note, one significant gap in Alternative B of the draft GMP is action to prevent and control the introduction and spread of invasive plant and animal species to the Park and Potomac

River. Invasive species have been identified as the second greatest threat to federally listed species nationwide. They are similarly a threat at Great Falls Park, and there are ways the Park can tackle the problem: through park management practices to prevent new invasive species introductions and control existing invasive species, and through interpretation to raise public awareness of the problem and to encourage park users to alter their behavior to address it (i.e., staying on formal trails, cleaning shoes and boat bottoms before visiting the Park, not releasing bait or other live exotic fish or animals into the Park or river, etc.). Any assessment of invasive species must consider the role of horses in the Park. Horses can contribute to the spread of invasive plants – through their hay, the seed they eat (and excrete), and by carrying soil with seeds in their hooves. Future Park trail management planning should consider the effects of horses on park vegetation as well as cultural resources. It is likely that once they are informed, the equestrian community would employ voluntary best management practices to minimize horse impacts on the natural resources they visit the park to enjoy.

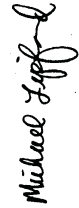
Finally, on the subject of natural versus cultural resources – we saw in the draft GMP references to addressing the effects of vegetation on cultural resources. As highlighted in the Potomac Gorge Site Conservation Plan, the original construction and ongoing preservation of the Park's cultural resources, as well as more recent Park facilities like the Visitor Center and new overlooks, have had significant impacts on the Park's natural resources. Balancing the protection of both natural and cultural resources under the Park's multiple use mandate will be critical as the Park develops its future Integrated Resources Management Plan.

We recognize the importance of the GMP and look forward to working with the Park to implement some of these important natural resource protection and public education initiatives for months and years to come.

Sincerely,



Nathaniel Williams
Maryland Executive Director



Michael L. Lipford
Virginia Executive Director

cc: Vince Santucci, Brent Sturry, Melissa Kangas, Debbie Feldman, Walter MacDowney,
Jesse Reynolds, GWMP
Jim Sherald, Dan Sealy, Diane Pavlek, Giselle Mora, Center for Urban Ecology
Marie Sauter, CHOH

GREAT FALLS TRAILBLAZERS Connecting our Community

September 22, 2005

National Park Service
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

Dear Park Service Personnel:

We are relieved that horses, bicycles and pets will not be banned from the park, and gratified that connections will be provided to the Potomac Heritage, Cross County and Georgetown Pike trails. Thank you for listening to earlier comments from the community.

We feel some improvements should be made to Alternative B:

- Construct 6' stone dust trails beside Georgetown Pike and Riverbend Road as shown in Fairfax County's Comprehensive Plan Trails Map. All others - developers, churches, schools, etc. - are required to do so. The trails could be separated from the roads by a barrier of trees, and meander to cause the least impact on mature trees. More visitors could then access the park via non-motorized modes of transportation.
- No trail should be closed or relocated until a complete study of the cultural/natural resources is documented. If necessary, the Matildaville and Mine Run trails should be relocated to protect sensitive areas, but not closed.
- Retain some social trails which do not adversely impact sensitive areas. Many universities have realized that it's smart to put the walkways where the people go. Care must be taken to preserve those social trails which allow neighborhood communities to enter the park without bringing a car and adding to congestion and pollution.
- Loop trails should be provided for all users.
- No group should be singled out by being subjected to a "permitting" process. Horseback riders are acknowledged to be the smallest number of all recreation users in the park. Many local businesses depend on the equestrian population in Great Falls. Horses are part of the area's history, a cultural resource.

P.O. BOX 844
GREAT FALLS, VIRGINIA 22066


We understand the tension between retaining the natural beauty of the park and maintaining its accessibility. Thank you for considering our comments. We believe these suggestions will strengthen the Park's connection with the community. We look forward to opportunities to partner with you in formation of a trail plan and construction of trails.

Sincerely,

Eleanor Week

Eleanor Week, President

cc Joan DuBois, Dranesville District Supervisor

 "mjb" To: <GWMP_Superintendent@nps.gov>
cc: "mjb@verizon.net"
10/04/2005 12:39 PM Subject: Attn: Great Falls GMP Team

AST
Please respond to
mjb



207 Canyon - Suite 301
Boulder, CO 80302
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Fairfax, VA 22031
703-532-6155

Ms. Audrey F. Calhoun, Superintendent
G.W. Memorial Parkway
C/O Turkey Run Park
McLean, VA 22101

Dear Ms. Calhoun:

The International Mountain Bicycling Association (IMBA) along with our local affiliate, the Mid Atlantic Off-Road Enthusiasts (MORE) submits the following comments on the Great Falls National Park General Management Plan and Environmental Impact Statement. Please add IMBA and MORE to your mailing list for all public notices involving the park.

Founded in 1992, MORE now represents thousands of mountain bikers in the D.C., Maryland, and Virginia metro area. Through the strong relationships we have forged with land managers in the area, we maintain over 200 miles of trails in the D.C. area—contributing of nearly 4,000 hours of volunteer work hours to trail building and maintenance over that last year alone. Additionally, we provide trail stewardship education and advocacy for all user groups, teaching sustainable trail development, trail use guidelines, trail maintenance fundamentals, as well as teaching skills for proper trail etiquette.

IMBA is a national education and advocacy organization with 550 affiliate member clubs, 32,000 individual members, and more than 400 corporate partners and dealer members. Our collective mission is to create, enhance, and preserve trail opportunities for mountain bikers coast to coast. IMBA develops and builds trails through formal partnership agreements with the U.S. Forest Service, Bureau of Land Management, U.S. Army Corps of Engineers, and National Parks Rivers and Trails Program.

We are proud of our most recent partnership agreement with the National Park Service and look forward to developing mountain bike opportunities across the country. We believe Great Falls is an ideal environment for mountain biking and complements this new agreement.

Based on a recent Outdoor Industry Association study, 39.3 million Americans 16 and older rode bicycles on narrow trails (singletrack) in 2004. This makes mountain biking the second largest trail use group in the country. Further, Virginia has had tremendous success developing park land as a destination for all user groups, significantly adding to the economic growth in the central and western parts of the state.

IMBA recognizes and appreciates that several national parks across the country have identified mountain biking as an important activity and embrace mountain bikes on dirt roads and trails. Opening dirt roads to bikes is a relatively simple, straightforward process and does not require formal rulemaking. IMBA has compiled a draft list of NPS units with dirt roads open to mountain bikes:

Dirt Roads (Draft) List:

Acadia National Park
Arches National Park
Badlands National Park
Big Bend National Park
Black Canyon of the Gunnison National Park
Canyonlands National Park
Cuyahoga Valley National Park
Death Valley National Park
Delaware Water Gap National Recreation Area
Hawaii's Volcanoes National Park
Joshua Tree National Park
Lake Mead National Recreation Area
Olympic National Park
Point Reyes National Seashore
Redwoods National Park
Theodore Roosevelt National Park
Yellowstone National Park
Zion National Park

Opening singletrack to mountain bikes requires a formal rulemaking process and can take approximately one to two years. The following draft list includes NPS units that have successfully opened trails to mountain bikes:

Dirt Trails (Draft) List:

Big South Fork National River and Recreation Area
Mammoth Caves National Park
Point Reyes National Seashore
Saguaro National Park

Mountain biking is an established activity on public lands adjacent to Great Falls. Beautiful scenery, singletrack trails, and proximity to popular tourist destinations attract riders to River Bend Park.

There, bicyclists enjoy access to similar environments and wildlife habitats found in Great Falls National Park.

MORE and IMBA supports an improved Alternative A that will enhance cycling opportunities within the park, both on paved and dirt roads and some trails. However, Alternative B (preferred alternative), as currently written, requires improvements before it adequately promotes this healthy, popular activity. We also believe the plan does not adequately investigate the merits of mountain biking and the possibility of safely opening new or existing singletrack trails to bicycles.

Improved Alternative B

1. In general, MORE and IMBA supports Alternative A with an improved trail maintenance initiative. While access to trails in Great Falls is limited, bikers and equestrians use carriage roads to access River Bend park, Difficult Run and the Fairfax Cross County Connector trails which encompass over 40 miles of shared-use trail.
2. Though it seems clear that Congress intended to restrict motorized use, not muscle-powered use such as mountain biking, from Wilderness Areas, Forest Service interpretations first enforced in 1984, have banned mountain bikes from Wilderness Areas. It is our understanding that the trails and dirt roads requested for mountain bike access are not located in areas of existing Wilderness or areas intended for inclusion into the federal Wilderness system. However, in other areas where mountain biking is acceptable, MORE and IMBA supports shared-use management where all user groups are subject to equal restrictions.
3. Mountain bikers and equestrians use the carriage roads that link Great Falls to other areas. We believe the new management plan needs to implicitly state that the Potomac National Heritage Trail be designated as bike and horse "friendly" ensuring these users will be able to traverse this section of the heritage trail, even following reroutes and fortifications of the canal zone.
4. We would like clarification regarding the proposed improvements to the Canal Zone and Canal Ruins. MORE and IMBA want to ensure that these trail changes would still allow horse and bike through traffic in the park and therefore have it specifically spelled out in the management plan.

Wildlife and Mountain Biking

As discussed below, several studies have investigated the relationship between mountain bikers and a diversity of wildlife. To date, some have concluded that bicycles clearly cause more harm or should be managed differently than hiking, horses, or OHVs.

In Canyonlands National Park researchers found that hikers caused bighorn sheep to flee in 61 percent of encounters. Sheep fled from mountain bikes only 6 percent of the time (Papouchis, Singer and Sloan 2001). On Utah's Anselopie Island, researchers investigated the response of bison, mule deer and pronghorn antelope to passing hikers and mountain bikers. The study concluded there is no biological difference between wildlife responses to hikers and bikers (Taylor and Knight 1993). Male Alpine Chamois were found to exhibit similar responses to hikers, joggers and mountain bikes in a 1996 study by Gauder and Ingold. Similarly, Bald Eagles wintering along the Boise River were flushed on 46 percent of all hiker passings, while bicyclists flushed the birds only 15 percent of the time (Spahr 1990). Please see the attached document, "Natural Resource Impacts of Mountain Biking," which provides a more extensive summary of the scientific discussion.

IMBA was founded to promote safe and responsible mountain biking. Our organization has extensive

international experience designing environmentally sound, sustainable trails and networks that minimize user conflict and wildlife disturbance. We cooperate with other units in the National Park Service, U.S. Forest Service, Bureau of Land Management, U.S. Army Corps of Engineers and numerous state and local land managers. IMBA offers this relationship and expertise to assist Great Falls in offering mountain biking on dirt roads and trails with minimal disturbance to animals, vegetation, dirt surfaces, and other park users.

Social Issues and Mountain Biking

Sometimes social issues among user groups arise. MORE and IMBA believe there are a number of ways to manage user groups without trail closures. Often, the problem can be resolved through trail re-routes, reconstruction, better signage, user education, and directional management or maintenance. Often this work can be done with volunteer trail leaders. The Subaru/IMBA Trail Care Crew has worked with hundreds of land managers across the country to design and repair sustainable mountain bike and multi-use trails. IMBA also offers the National Mountain Bike Patrol program that could help Great Falls establish a volunteer system of bicycle education and assistance.

With regard to the social impacts of recreation, the science is well developed and relatively uncomplicated. Roger Moore's book, "Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice," provides solid facts and examples and offers reasonable evidence of problems and solutions.

To date, there is no information to support the claim that the presence of bicycles on shared-use trails increases the risk to other trails users' safety. The few existing studies indicate that mountain bicyclists have an excellent safety record, requiring few rescue efforts. Safety is probably less of a concern on singletrack trails compared to roads because bicycles travel at much lower speeds on narrow trails.

Appropriate Travel Ways

IMBA's members are strong advocates of environmental protection and value riding in and preserving natural settings. They dedicate nearly one million hours of volunteer trail work each year to repair and construct trails to sustainable standards. IMBA respects the needs of sensitive wildlife and vegetation. We support trail management to address these concerns when it is uniformly applied to all recreation users.

Summary

Great Falls National Park should afford mountain biking, a healthy, muscle-powered, low impact activity, an equitable level of access that includes some dirt roads and trails. As discussed above, MORE and IMBA agree with the body of science that indicates the impacts of mountain biking on wildlife is similar to other user groups. Fears of mountain biking based on this argument are unfounded. In fact, mountain biking is a safe, enjoyable activity whose participants actively support environmental protection, a shared-use ethic, and trail maintenance and restoration. Mountain bikers are excited to explore portions of Great Falls National Park under their own power, in a manner respectful of their surroundings.

Sincerely,

Majed Jafari
MORE Board of Directors
703-532-6155



Impact_summary.pdf

Scott Scudamore
IMBA Area Representative
703-503-5594

Natural Resource Impacts of Mountain Biking

A summary of scientific studies that compare mountain biking to other forms of trail travel

By Gary Sprung, International Mountain Bicycling Association

In recent years, hiking and environmental groups have often lobbied to ban mountain bikes from trails on the grounds that mountain bikes damage the environment. Some land managers have closed trails to bicycling because of alleged, excessive resource damage.

Do mountain bikers truly cause more impact on natural resources than other trail users?

Very little research has attempted to answer this question, but the empirical studies thus far do not support the notion that bikes cause more natural resource impact. What science does demonstrate is that all forms of outdoor recreation — including bicycling, hiking, running, horseback riding, fishing, hunting, bird watching, and off-highway-vehicle travel — cause impacts to the environment.

Social scientists have conducted surveys to study the feelings, perceptions, and attitudes of cyclists, hikers, equestrians and motorized trail users. This information, along with anecdotal evidence and media reports, show that trail users sometimes do not get along. User conflict is fairly well understood and demonstrably real.

People involved in user conflict sometimes simply state their preferences and ask decision-makers to take action. In a democracy, the allocation of trails based on users' differing interests is a normal, appropriate course of action by land managers. But when people make unsubstantiated allegations regarding natural resource damage to justify prioritization of their type of trail use, land managers should be wary.

To make rational, non-arbitrary, less political decisions regarding which groups are allowed on particular routes, managers need scientific studies that compare the impacts of the various user groups. Objective information that is independent of conflicting human desires can form a basis for sound policy decisions. Better understanding of the differing impacts of the various recreation forms can guide political debate and public policy. This document looks at differences in three main categories: physical impacts to trails or facilities, vegetation damage, and effects on wildlife.

In each case, several studies have examined the topic, but only a handful have compared the effects of bicyclists with other trail users.

¹ Science also demonstrates that roads — whether used or not, or regardless of which groups use them — can cause harmful environmental effects. A more limited body of science indicates that trails may cause somewhat similar effects. But this document addresses only the comparison of user groups' impacts, not the effects of roads and trails.

No scientific studies show that mountain bikers cause more wear to trails than other users.

Trails deteriorate over time. To what extent do bicyclists cause this, and how does that compare with the impacts of other trail users? Many people have hypothesized based on ideas involving the characteristics of tires versus shoes, skidding, area and pressure of impact, and other factors. But as of 2003, only two empirical studies have scientifically compared the erosion impacts of bicycling with other forms of trail travel.²

Wilson and Seney: Hooves and feet erode more than wheels

In 1994, John Wilson and Joseph Seney of Montana State University published "Erosional Impacts of Hikers, Horses, Motorcycles and Off-Road Bicycles on Mountain Trails in Montana." (12) The study tracked 100 passages by each of the four groups over control plots on two trails in national forests. For some of the passages, the researchers pre-wetted the trail with a fixed quantity of water using a rainfall simulator. The researchers measured sediment runoff, which correlates with erosion.

Wilson and Seney found no statistically significant difference between measured bicycling and hiking effects. They did find that horses caused the most erosion of the trails, and that motorcycles traveling up wetted trails caused significant impact. They also concluded, "Horses and hikers (hooves and feet) make more sediment available than wheels (motorcycles and off-road bicycles) on prewetted trails and that horses make more sediment available on dry plots as well." (p. 74) Wilson and Seney suggested that precipitation will cause erosion even without human travel and this factor may significantly outweigh the effects of travel. Trail design, construction, and maintenance may be much more important factors in controlling erosion.

Chiu and Kriwoken: No significant difference between hiking and biking trail wear

In a study whose publication in *Annals of Leisure Research* is pending, two researchers at the University of Tasmania, Australia, conducted an experiment on an abandoned fire road to compare track ("track" is the term for trail in Australia) impacts from hiking and bicycling. For the study "Managing Recreational Mountain Biking in Wellington Park, Tasmania, Australia," (2) the authors had hikers and bicyclists pass test plots 400 times each, and measured the surface profile of the track before, during and after the passes. They compared flat and steep and wet and dry conditions. Chiu and Kriwoken found no significant difference in the trail wear caused by the two user groups. They did find significant impact from skidding tires, and they did find that impacts on wet trails were greater than on dry for both types of use.

Goefft and Alder: Erosion trends not clear

Other, non-comparative studies have looked at the erosion effects of bicycling. Goefft and Alder (5) investigated erosion on two trails in western Australia for one year, with various combinations of uphill, downhill and flat sections, curved and straight. Trail width varied with time, narrowing a little but not showing a clear trend. Soils on older sections of trail were more

compacted than newer. Erosion was influenced by slope, time, and age of trail, but did not show a clear trend.

Bjorkman: Artificially hardened trails erode less

Bjorkman, 1996, (1) cleared vegetation from two very steep slopes (62%) in a state park in southern Wisconsin and left one bare while protecting the other with artificial hardening surfaces. Trail users traveled over these surfaces and the study measured sedimentation from each slope. The protected path generated .11 tons per acre, and on the untreated slope produced 10.86 tons per acre.

Crockett: Minimal change from repeated bicycle passage

In 1986 the Santa Clara County Parks and Recreation Department of northern California studied the erosional effects of bicycling on the Edwards Field Trail (3). Forty-five cyclists made a total of 495 passes over 12 transects. Measurements were taken before and after the passes. Trail width both increased and decreased at various plots, and the same was true of the cross-sectional area of the transect, which is a measurement of the amount of soil in that spot. The researcher, Christopher S. Crockett, observed minimal change in the visual trail characteristics in most cases. The data led the county parks department to open trails to mountain biking.

Discussion:

The two comparative studies discerned minimal differences between bicycling and hiking. These studies may not resolve the continuing debate over who does what to trails. This scientific inquiry needs to be repeated in other geographic locations, on other soils, with more passages by each user group.

Because the Goefft and Alder and Bjorkman studies allowed multiple users on the same trails without measuring differences, and the Crockett/Santa Clara study involved only bicyclists, those studies do not provide information to compare erosion processes among users.

No scientific studies indicate that bicycling causes more degradation of plants than hiking.

Trails are places primarily devoid of vegetation, so for trail use in the center of existing paths, impacts to vegetation are not a concern. This issue is relevant with regard to widening of trails and travel off of established trails.

Thurston and Reader: Hiking and bicycling trample vegetation at equal rates

Again, only one study has compared bicycling with other recreation with regard to the damage to vegetation caused by trampling. Eden Thurston and Richard Reader of the University of Guelph, Ontario, published in 2001, "Impacts of Experimentally Applied Mountain Biking and Hiking on Vegetation and Soil of a Deciduous Forest." (10) The authors set up two identical lanes of travel over natural vegetation in a deciduous forest. They measured plant stem density, species richness, and soil exposure before, during and after the 500 passages in each lane by hikers and bicyclists. Results: "Three principal findings emerged from this study. First, impacts on vegetation and soil increased with biking and hiking activity. Second, the impacts of biking and

hiking measured here were not significantly different. Third, impacts did not extend beyond 30m of the trail centerline." (Thurston and Reader, 2001, p.405)

Bjorkman: Vegetation on shared-user trails occurs mostly in center of trail

Weesner/NPS: Moderate trail widening controlled by volunteers
Bjorkman, 1996, (1) studied erosion of existing and brand new trails in a state park in southern Wisconsin. Measurements on existing trails indicated a rapid and substantial loss of vegetation along the trail centerline. The disappearance of vegetation 2.0 meters to the side was much less and slower. Along the centerline, soil compacted steadily, but there was little compaction two meters to the side. The width where no vegetation existed increased rapidly at first, then a bit more slowly, and was more rapid in shade than in sun, and more pronounced where the soil had more sand or less silt. Weesner, 2003, (11) reported the results of National Park Service observations of a trail in southern Arizona over almost a decade. Results: Some trail segments widened moderately and some just a little. Volunteer trail maintenance occurred on some plots and effectively kept the trail narrow.

Discussion:

The Thurston and Reader study provided high-quality information through a solid process. Neither Bjorkman nor Weesner controlled for multiple-uses and thus those studies do not provide a basis for comparison of vegetative impacts of trail users.

Science has yielded mixed results comparing impacts on wildlife of hiking and bicycling.

To date, four studies have rigorously compared the impacts of bicycling on wildlife with the impacts of other users. The studies involved bison, mule deer, pronghorn antelope, desert bighorn sheep, European alpine chamois, and American bald eagle. A fifth study provided a statistical suggestion regarding grizzly bear.

Taylor and Knight: Hiking and biking cause same impact to large mammals on Utah Island
In 1993, Audrey Taylor and Richard Knight published "Wildlife Responses to Recreation and Associated Visitor Perceptions." (9) a study on Antelope Island, situated in the Great Salt Lake of Utah. They measured behavioral responses of bison, mule deer and pronghorn antelope to the passages of hikers and bicyclists. In each case, an assistant acted as a hiker or cyclist while a researcher collected data as a hidden observer. The recreationist moved at a typical pace, did not stop nor look at the animals, and did not talk. The study measured alert distance, flush response, flight distance, and distance moved. Recreationists stayed on trails for the bison and antelope trials, while the mule deer observations involved recreationists traveling both on and off trails. Taylor and Knight wrote, "...the large degree of overlap between the 95% confidence intervals for hiking and biking is indicative of a lack of biological difference between wildlife responses to these activities." (p.955)

Calculating the amount of trails and the sensitivity distances of wildlife, Taylor and Knight estimated that approximately seven percent of the island "was potentially unsuitable for wildlife

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due to disturbance from recreation." (Only the northern half of the island has trails, and the southern half is off limits to public recreation.)

Taylor and Knight also surveyed general public recreationists on the island and found that hikers, bicyclists, and equestrians blamed other groups more, and blamed their own groups less, for wildlife impacts. They also found that all recreationists underestimated the distances at which wildlife were sensitive to human presence.

Papouchis, Singer and Sloan: Hikers have greatest impact on bighorn sheep

Christopher Papouchis, Francis Singer, and William Sloan, reported in 2001 on "Responses of Desert Bighorn Sheep To Increased Human Recreation." (7) The authors observed 1,029 bighorn sheep/human interactions in two areas, a high-use and a low-use, of Canyonlands National Park, Utah, in 1993 and 1994. They compared behavioral responses, distances moved, and duration of responses to vehicles, mountain bikers, and humans on foot. Hikers caused the most severe responses in desert bighorn sheep (animals fled in 61% of encounters), followed by vehicles (17%) and mountain bikers (6%), apparently because the hikers were more likely to be in unpredictable locations and often directly approached sheep.

Gander & Ingold: Hikers, joggers & mountain bikers—all the same to chamois

In 1996 Hans Gander, and Paul Ingold published, "Reactions of Male Alpine Chamois *Rupicapra rupicapra* to Hikers, Joggers and Mountainbikers." (4) The authors measured the effects on male alpine chamois of the passage of hikers, bicyclists and joggers. Thirty-two passages were carried out by single persons traveling on a trail that runs through a meadow above timberline in a game reserve in the Bernese Oberland of Switzerland. The animals responded similarly to each of the human activities. Subsequent to the passage of people, the chamois tended to avoid the pasture.

Spahr: Hikers have greater impact on eagles than cyclists

In her 1990 graduate thesis, Robin Spahr examined "Factors Affecting The Distribution Of Bald Eagles And Effects Of Human Activity On Bald Eagles Wintering Along The Boise River." (8) Spahr observed people recreating and also "simulated" recreational behaviors on a section of the Boise River in Boise, Idaho, and measured the effects on eagles.

Spahr found that walkers caused the highest frequency of eagle flushing, with 46% of walkers causing eagles to flush. Fishermen were second at 34%; bicyclists - 15%; joggers - 13%; and vehicles - 6%. Bicyclists caused eagles to flush at greatest distances, with a mean of 148 meters, a minimum of 96 meters and a maximum of 200 meters. Walkers' mean was lower, at 87 meters, but their minimum was closer, at 17 meters and maximum was higher than bicyclists', at 300 meters. Mean distance of eagle flushing by vehicles was 107 meters; by fishermen, 64 meters; by joggers, 50 meters. "The disturbance indexes, which reflect both flushing distance and frequency, indicated that walkers were the most disturbing to eagles. Bicyclists, followed closely by fishermen, were the next most disturbing," Spahr wrote.

Herrero and Herrero: Bikers more likely to suddenly encounter bears

In 2000 Jake Herrero and Stephen Herrero published, "Management Options for the Moraine Lake Highline Trail: Grizzly Bears and Cyclists." (6) The authors' firm was hired by Parks

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Canada to provide recommendations for managing bicycling on a particular trail in Banff National Park in Alberta Canada. Intended primarily as a management strategy, the report was not an experimental investigation of grizzly bear responses to bicyclists. However, the authors referenced their compiled database of human/grizzly bear interactions and found a statistical suggestion that bicyclists, because they travel quietly and more quickly, are more likely to have sudden confrontations with grizzly bears on that trail than are other trail users (hikers and equestrians). The authors also found no difference between the effects of bicycling and hiking on bear habitat and stated there was no evidence that bicyclists should be managed differently than other users in that regard.

Discussion:

These studies just scratch the surface of a complex topic. The diversity of species and their differing responses to human recreation make generalizations across species difficult. However, this group of studies at least suggests that the impacts of bicycling on wildlife are generally similar to the effects of hiking.

Conclusion

Mountain biking, like other recreation activities, does impact the environment. On this point, there is little argument. But with regard to the non-human environment, people often debate whether or not mountain bikes cause more damage to trails, vegetation, and wildlife than other forms of recreation such as hiking and horseback riding.

A body of empirical, scientific studies now indicates that mountain biking is no more damaging than other forms of recreation, including hiking. Thus, managers who prohibit bicycle use (while allowing hiking or equestrian use) based on impacts to trails, soils, wildlife, or vegetation are acting without sound, scientific backing.

In contrast, if a manager prohibits one user group on the basis of providing a particular type of experience for another group, the evidence provided by social studies may or may not justify that decision. The wisdom of prohibiting particular user groups in order to satisfy the desires of other groups is a matter for politics rather than science.

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8401 Georgia Avenue • Suite 612 • Silver Spring, MD 20910 • 301.608.1188 • Fax: 301.608.1144
www.potomac.org

October 5, 2005

Audrey F. Culhoun, Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22102

RE: Draft General Management Plan/Environmental Impact Statement
for Great Falls Park, Virginia

Dear Ms. Culhoun:

Thank you for the opportunity to comment on the Draft General Management Plan/Environmental Impact Statement for Great Falls Park, Virginia. We applaud your effort to strike a balance between protection of natural resources and recreational enjoyment of Great Falls Park. Overall, we believe that the draft management plan contains many positive recommendations that will benefit both the public and natural resources, and particularly, the Potomac River. Generally, we support the preferred alternatives identified in the draft plan.

Potomac Conservancy urges the National Park Service to consider a more rigorous effort to engage local user groups regarding management of Great Falls Park, Virginia. As you know, Great Falls Park is heavily utilized by climbers, equestrians, hikers, boaters, and others. Many of these users are conservation-minded and would like to see the Park's natural areas protected while preserving access to recreational resources. The permitted recreational areas for these groups could be dramatically impacted by some of the actions set forth in the draft plan. For example, climbers are particularly concerned about the potential closure of climbing areas. Perhaps through education and partnership, a plan can be developed that would reduce impacts to sensitive plant species, while retaining adequate access to popular climbing locations. We urge you to consider holding public discussion forums focused on various user groups to encourage education about sensitive resources and an open discussion about how to protect these resources.

Potomac Conservancy strongly supports the draft plan's recommendations regarding a Trail Management Plan. Development and implementation of such a plan would help to reduce the spread of invasive species, reduce impacts to sensitive species, and reduce erosion that could negatively impact water quality.

Thank you again for your effort to put together a management plan that addresses the critical issues facing Great Falls Park. We at Potomac Conservancy want to support

Protecting the health, beauty, and enjoyment of the Potomac

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your efforts in whatever way possible, through volunteer support, or otherwise. If you have any questions regarding these comments or the role Potomac Conservancy can play in supporting the Park, please do not hesitate to contact me at 301.608.1188, ext. 204, or e-mail: lathbury@potomac.org.

Sincerely,

Meredith Lathbury

Meredith Lathbury
Vice-President for Conservation,
General Counsel

Potomack Chapter

Virginia Native Plant Society

P.O. Box 5311, Arlington, VA 22205
December 4, 2005

Jon James, Deputy Superintendent
Deborah Feldman, Park Planner
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Dear Mr. James and Ms. Feldman,

The Potomack Chapter of the Virginia Native Plant Society (VNPS), representing 500 members in Northern Virginia, strongly supports Alternative B of the Great Falls Park Draft Management Plan. VNPS is dedicated to preserving Virginia's native plants, natural communities, and their habitats. Our organization recognizes Great Falls Park as having one of the greatest diversity of plant species and natural communities in the state. In September 2005, our chapter added Great Falls Park to the Registry Program of VNPS. The nomination letter stated that "the park's complex topography, varied hydrological influences, and diversity of flood-influenced habitats fosters a corresponding diversity of community types, some of them state or globally rare and of significant conservation concern. Of a total of 23 communities recently identified in the Potomac Gorge, 16 are known to occur at Great Falls Park".

Our members work in various ways to further our mission - we have monthly meetings where speakers inform us of important issues involving native plants, regular walks to see plant communities at local parks including Great Falls Park, and a volunteer group currently removing invasive non-native plants at Turkey Run Park. Our Botany Chair Cris Fleming surveyed and reported on the rare and uncommon plant species at Great Falls Park in 1993-94. Another member of our chapter, Assoc. Professor Marion Lobstein, has led monthly botanical walks for the park for many years. Other VNPS Potomack Chapter members, such as Dr. Stanwyn Shetler, Botanist Emeritus at the Smithsonian Institution, also lead walks at Great Falls Park.

We are very pleased that, under both plans, efforts will be made to limit visitor impact on the rare plant communities of the bedrock terrace. However, Alternative B offers an opportunity to evaluate both formal and social trails in other areas of the park that contain rare plant communities such as the basic oak-hickory forest on the higher terraces, the wetlands around Mine Run and the swamp, and the bedrock floodplain above the falls.

We support the development of a Trail Management Plan which could lead to the removal of many social trails and the burning of new social trails. We also applaud the exploration of removal of horse trails, particularly around Mine Run. For many years, we have been concerned about the trampling of rare plants and their habitat along Mine Run near Clay Pond. We hope an agreement can be reached with the horseback-riding community that will result in alternative trails away from areas with sensitive natural and cultural resources.

We also support the preparation of a Climbing Management Plan in consort with the rock-climbing community. Social and climbing trails to the bedrock terrace impact the rare plant communities more than the actual climbing routes, so we support closing some of the trails through the bedrock terrace, particularly the large prairie just east of the picnic area, but leaving most of the actual climbing routes intact.



Potomack Chapter

Virginia Native Plant Society

of the trails through the bedrock terrace, particularly the large prairie just east of the picnic area, but leaving most of the actual climbing routes intact.

We are deeply concerned about any actual or potential damage to the rare plant communities at the park, but we are cognizant of the National Park Service's mandate to balance cultural and natural resources protection with recreational opportunities and we believe that Great Falls Park sets a fine example of both missions.

However, there are several aspects of both alternatives, even Alternative B, that disappoint us and we would like to suggest some additions to the Alternative B plan. First and foremost, there is no mention of an effort to control the spread of non-native invasive plants. Non-native species, particularly Chinese wisteria, Japanese stiltgrass, and Porcelain-berry, already threaten to destroy some of the rare plant communities in the park. We strongly recommend that a proposal to develop an Invasive Plant Management Plan be added to Alternative B of the Draft Management Plan. The Nature Conservancy has many projects working to control invasive plants in the Potomac Gorge and would be able to add Great Falls Park to its sites. Also, our chapter would be pleased to work with you on this plan.

Second, we would like to see a proposal in the management plan to develop signage in the park that would educate visitors on the unique natural habitats of the park, particularly the bedrock terrace, the bedrock floodplain, and the swamp. Although there is signage about the cultural and historical aspects of the park such as the old Potomack Canal (from which our chapter takes its name), there is currently no signage about the rare natural communities and the need to protect them. Particularly when the park is closing trails to protect these rare communities, it seems very important to educate visitors about why these areas need to have limited access. The signage on the boardwalk trail to Olmstead Island across the river at Great Falls, MD would be a good model for signage at Great Falls Park. Signage should be placed near the natural communities but not at them as even small construction projects disturb the habitat and visitors reading the signs would likely impact the nearby soil.

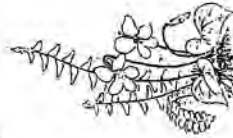
Third, we see no need to build a new facility for park offices, maintenance, and law enforcement. We don't find the current maintenance facility at the entrance to the park offensive at all; in fact, visitors that we questioned said they hardly noticed it behind the fence. We understand that park staff may desire a new facility, but we believe that it is a benefit to park visitors to have the rangers located at the visitor center where they can easily interact with the public. Furthermore, any new construction is a major soil disturber and creates a corridor for the spread of invasive plants. We are very concerned that construction even in the developed area could impact the habitats of the natural and cultural areas because of soil disturbance, run-off, and invasive species spread.

Thank you very much for allowing us to comment on the Great Falls Park Draft Management Plan. Please keep us informed of progress on the plan.

Sincerely,

Marianne Mooney

Marianne Mooney, President
Potomack Chapter, VNPS



While many communities nationwide are spending millions of dollars to create and enhance whitewater features in order to improve the quality of life and to encourage tourism visitation, Washington D.C. is lucky to have a spectacular *natural* whitewater park in its back yard. We hope that the NPS recognizes the incredible value that the Potomac River itself has to the American public as it flows by the Nation's capitol and through the Great Falls National Park.

The GMP/EIS is largely silent on the issue of whitewater boating in the Park, however we feel that both alternatives A and B meet our general interests. Specifically, both alternatives maintain existing river access sites, allow use of the entire Potomac River as it flows through the Park, protect ecological and aesthetic aspects of the river's viewshed, and generally provide a high quality experience for paddlers utilizing the Park.

It appears likely that Alternative B will offer slight improvements through water quality enhancements and education, improved trails, and improved traffic. For this reason we support the selection of Alternative B. In the event that Alternative B is selected, we look forward to working with the NPS in its effort to evaluate both the formal and social trails found throughout the Park, especially to the extent that these trails relate to access to the river.

Since many of our members are also rock climbers, we would like to encourage the NPS to work closely with the local climbing community and with the Access Fund in the development of the Climbing Management Plan as described in Alternative B. We recognize the need to protect rare plant species, and hope that through collaboration the NPS will be able to protect these species while allowing climbing to occur at as many locations as possible throughout the park. We have found highly specialized recreational users to be also passionate stewards of the lands and waters they enjoy. Thus, these users are eager to take any steps possible to protect the resources that enrich their lives.

Thank you for considering these comments.

Respectfully Submitted via Email on December 7th, 2005, by:

Kevin Colburn



National Stewardship Director

cc: Mark Singleton, Executive Director, American Whitewater
Jason Keith, Esq., Policy Director, The Access Fund



Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101
GWMP_Superintendent@nps.gov

RE: Great Falls National Park GMP/EIS

Dear Superintendent Calhoun,

American Whitewater has reviewed the General Management Plan (GMP) and Environmental Impact Statement (EIS) and we are pleased to offer our comments on the document. American Whitewater is a national nonprofit organization dedicated to protecting and restoring our Nation's whitewater rivers while enhancing opportunities to enjoy them safely. A significant number of our roughly 6,700 members live near the Great Falls Park, and regularly participate in whitewater boating on the Potomac River within the park boundaries. Therefore, we have a direct interest in the management of the Park and the preservation of its unique values.

The Great Falls of the Potomac, and the gorge below the falls, are highly valuable recreational resources to the whitewater paddling community. The river serves not only as a recreational staple for the thousands of paddlers living in the immediate metropolitan areas, but also as a destination for regional paddlers wanting to experience the truly unique scenery and rapids of the Potomac. The values that make it so important include close proximity for many paddlers, long distances to other whitewater boating opportunities, year round suitable flows, variety of rapid characteristics (waves, holes, waterfalls) and difficulties (class I-V), beautiful scenery, and river access that is safe and legal.

Great Falls Trail Blazers
P O Box 844
Great Falls, VA 22066

December 14, 2005

Deborah Feldman, Park Planner
GWMP Headquarters
C/o Turkey Run Park
McLean, VA 22101

Dear Park Service Personnel:

Please accept this letter as the final comments of the Great Falls Trail Blazers, an organization of 700 members, to the National Park Service's GMP/EIS. We are encouraged to see that horses, bicycles and pets will not be banned from Great Falls Park as had once been considered, and we are pleased that trail connections will be established to the Potomac Heritage, Cross County, Georgetown Pike and River Bend Road Trails. Thank you for listening to earlier comments from the Community on these points.

We recommend Alternative B, but believe that it requires a number of significant improvements before the release of a Final Plan.

- Include the multi-use Georgetown Pike and Riverbend Road trails on Park property consistent with Fairfax County's Comprehensive Plan Trails Map, locations to be determined in the Trails Management Plan. The trails should be separated from the roads by a barrier of vegetation, and meander to cause the least impact on mature trees. More visitors could then access the Park via non-motorized modes of transportation.
- No existing trail should be closed or relocated until a complete study of its impact on cultural or natural resources is documented. Regarding the Matildaville and Mine Run trails in particular, these trails should be relocated to the extent necessary to protect sensitive areas, but certainly not closed to any existing use.
- Retain all social trails which do not adversely impact sensitive areas. There should be a presumption that the trails are there for a good reason. Colleges and universities have long realized the simple wisdom of putting their walkways where people actually walk. Special care must be taken to preserve, in particular, those social trails which allow neighborhood communities to enter the Park without bringing a car, or car and trailer, and adding to congestion and pollution.
- Loop trails should be provided for all users

National Park Service
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- Specific groups should not be singled out by being subjected to a permitting process. We believe that a permitting process would be impracticable for any existing mainstream activity, given the unique role of the Park to such a large population center. Unlike many other larger National parks, the 800-acre Park is not so much a destination resource in itself as a place where persons already visiting or living in the Greater Washington Metropolitan area can escape for a few hours of recreation on short notice. The wonderful spontaneity that the Park now affords would be lost if equestrians, climbers, cyclists, or kayakers were required to obtain permits as a condition to entry.
- Permitting is especially inappropriate for horseback riders. Horseback riders are acknowledged to be the smallest number of all recreational users in the Park. Many of them are now able to enter the Park on existing social trails (and soon the Cross County Trail from Difficult Run) for short rides without the need to motor in and find a place to park their car and horse trailer. Many local businesses depend on the equestrian population in Great Falls. Horses are an important part of the area's history, a cultural resource, and a delight to many of the Park's visitors, especially children, when encountered on the trails. Horseback access to the Park should be encouraged, not subjected to restriction.

The Great Falls Trail Blazers fully understand the twin goals of retaining the Park's natural beauty and culture while preserving its accessibility to the public. The balancing of these interests need not be provocative or difficult. We believe these suggestions will strengthen the Park's connection with the Community. We look forward to opportunities to work with you in the development of the Trail Management Plan that the Plan contemplates, and to continue our practice of helping the Park staff in constructing and maintaining Park trails for all to enjoy.

Sincerely,

Eleanor Weck, President

cc Joan DuBois, Dranesville District Supervisor

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 greatfallsaccess@gmail.com
 (301) 320 5035

December 14, 2005

Superintendent Audrey F. Calhoun
 George Washington Memorial Parkway
 National Park Service
 c/o Turkey Run Park
 McLean, VA 22101

Re: Draft General Management Plan/Environmental Impact Statement for Great Falls Park

Dear Superintendent Calhoun:

Friends of Great Falls welcomes the opportunity to comment on the draft General Management Plan/Environmental Impact Statement for Great Falls Park.

Friends of Great Falls (FOGFF) is a coalition of climbers in DC/MD/VA that was organized several months ago when the draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Great Falls Park was released.

FOGFF (www.friendsofgreatfalls.com) includes members of the American Alpine Club, Potomac Mountaineering Club, SheClimbs, DCOutdoorRockClimbing (an internet club), as well as representatives from SportRock (a local climbing gym), other outdoor education groups and a number of individual, non-affiliated climbers. Through these constituent groups, we can readily contact 500-600 climbers in this area, many of whom are frequent visitors to Great Falls throughout the year to participate in climbing and other recreational activities.

FOGFF was created because of concern amongst the local climbing community as to the proposals put forward by the NPS in the draft GMP/EIS, particularly those listed in **Alternative B** that mention the closure of cliffs, permits and permanent anchors. The public meeting on September 17, 2005 and the lack of details available from NPS staff on some of the proposals emphasized our concerns.

In the two months since that meeting, FOGFF has met on a number of occasions with NPS staff to gain a better understanding of the NPS proposals. We have also briefed our constituent groups as to our understanding of the issues for climbing raised by the NPS proposals.

Although the period for public comment on the draft GMP/EIS is at an end, FOGFF intends to remain in existence, to ensure that climbers' concerns are considered adequately in the revised

plan and we look forward to the opportunity to work with the National Park Service. As part of this process, we encourage the NPS to regard FOGFF as the key point of contact with the climbing community as regards Great Falls.

The remainder of this submission summarizes FOGFF concerns with the draft GMP/EIS. We recognize that the proposals in the draft GMP/EIS affect many Great Falls users, not just climbers. This FOGFF submission is restricted to issues involving climbing.

General Comments on the Draft GMP/EIS

As it is currently written, the GMP/EIS favors preservation of natural resources over recreational use of Great Falls Park. FOGFF recognizes that recreational access must be balanced with proper land management in order to protect natural resources. However, it should be noted that Great Falls Park provides a unique recreational resource in the DC area. Specifically, Great Falls Park contains some of the closest, most popular climbing opportunities within a three-hour drive of Washington.

The draft GMP/EIS lacks sufficient information in two key respects:

- There is inadequate detail in the draft GMP/EIS to fully evaluate the impacts of the proposals on climbing, particularly for **Alternative B**
- There is no evidence in the GMP/EIS indicating that climbing is an issue at Great Falls in terms of impacts on natural resources

GMP/EIS Proposed Alternatives

The National Park Service has proposed two choices for the GMP/EIS. With regard to climbing, neither option provides a conservation stance that balances the protection of natural resources with recreational access. **Alternative A**, which is almost a "do nothing" option is required in such documents and is not seen by the NPS as a serious candidate. **Alternative B** is clearly the NPS preference, and contains various proposed restrictions on climbing. It also suggests that a Climbing Management Plan (CMP) will be required.

FOGFF strongly believes **Alternative B** favors preservation of natural resources while sacrificing the recreational value of Great Falls Park.

Given the two alternatives in the draft GMP/EIS, FOGFF is in favor of **Alternative A**, the "no changes" proposal. This effectively means climbing would continue as at present, except in theory for access to Gorky Park, the MicroDomes and the Flat Iron. We understand from meetings with the NPS that there are alternatives to complete closure of the above mentioned areas; this is discussed later.

¹ Such arrangements between the NPS (or equivalent State authorities) are quite common at many climbing areas in the US, and a number of groups similar to FOGFF have been set up, some as legal entities with non-profit status.
² Apart from the proposed closure of Gorky Park, the MicroDomes and the Flat Iron.

If Alternative B or a variant of "B" is chosen, there needs considerable modification in terms of the proposals for climbing:

- The draft GMP/EIS suggests 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.

Climbing Management Plan

FOGPF believes that 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.

However, should a CMP be proposed in the revised GMP as part of Alternative B or an equivalent, it must be prepared collaboratively with the local climbing community, including FOGPF. 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 (below).

Climbing Permits

FOGPF believes it is important that the National Park Service avoid unnecessary and unreasonable management restrictions at Great Falls Park. The proposal in the draft GMP/EIS for Alternative B – permits applied for in advance, used to restrict access – would effectively end recreational climbing at Great Falls.

We note there is no reason given in the GMP/EIS for requiring permits. Also, the draft plan does not provide any details on how a permit system might be instituted or how this would protect rare resources.

The FOGPF stance on this is very clear:

- The use of a permit system to regulate access to the climbing areas in the Mather Gorge is unacceptable, and these proposals should be removed from the GMP
- The only time that a permit system could be acceptable is as an alternative to justifiably closing a climbing area – one possibility being Gorky Park/MicroDome/Flat Iron (see later). In this situation, climbing permits should be free and available without advance notification or administrative procedures.
- For commercial groups – permitting as currently required should continue

Closure of Climbing Areas

According to the draft GMP/EIS, under both alternatives A and B, access to Gorky Park, MicroDome and the Flat Iron will be closed for general visitor safety and to limit the impact of invasive plants.

In addition, the GMP/EIS indicates that under Alternative B that unspecified climbing areas in the Mather Gorge might be closed in the future to protect rare resources (plants) from climber impact.

In the view of FOGPF, these are extreme provisions:

- According to the draft GMP/EIS, 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 FOGPF is denied the opportunity to review the assessments (as is currently the case³).
- 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. FOGPF believes it may be entirely feasible to protect natural resources by other measures.

As regards access to Gorky Park, MicroDome and the Flat Iron:

- The MicroDome in particular is a superb climbing resource, with climbing unlike the other Great Falls cliffs. The difficulty of the routes and the requirement for placing natural anchors

³ FOGPF has been denied access to the only detailed information available (the Planning reports) in spite of a Freedom of Information Act (FOIA) request, and our indication to the NPS that the FOGPF representatives with botanical knowledge would abide by any restrictions placed by the NPS in terms of disclosure of the reports. The reports as provided under FOIA were so heavily redacted as to be useless.

- (there are no trees on top of that area) limit this area to experienced climbers only. This is why it is not as popular as other cliffs (this point is made in the GMP/EIS).
- The NPS has acknowledged to FOGF that there are routes close to the river 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 to FOGF that it is likely to require permits for climbers to access these three specific areas. Such permits, as long as they relate to these 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 Anchors

The draft GMP also suggests that under Alternative B permanent anchors may be installed at Great Falls Park, although the draft plan contains no details of what these anchors would be or where they would be located. There is also no reason given for installing permanent anchors, and no identification of what perceived problem this is intended to solve:

- FOGF believes there is no need for permanent anchors at Great Falls, as there is no justification provided in the draft GMP/EIS to support this action
- 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/Access Fund and reference to a requirement for this joint effort should be in a CMP if that is developed
- If installed, climbing should not be restricted to locations with installed anchors nor should climbers be restricted to using permanent anchors.
- Under no circumstances should the National Park Service make unilateral decisions to install climbing anchors.

Closing Social Paths

The draft GMP/EIS suggests the closure of social paths in Great Falls Park. FOGF feels that closure or development of social trails should be on a case-by case basis.

Climbers are respectful of the need to protect the natural resources of Great Falls Park and it is likely that climbers would be willing to use designated trails to reach climbing areas.

As regards existing trails to climbing areas, which may be classed as "social" by the NPS:

- It is acceptable to reroute social paths 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.

Conclusion

Climbers are very willing to work with the NPS to meet NPS concerns as regards the protection of natural resources. However, for this to work effectively, the NPS needs to recognize the importance of Great Falls as a climbing area for this region. There also needs to be a recognized formal process for the NPS and the climbing community to address issues together. This draft GMP/EIS, and the associated comment period, are only the start:

- FOGF recommends that 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 needs to be recognized formally in the GMP/EIS or through a Memorandum of Understanding

I hope that these comments help the National Park Service in identifying an appropriate choice of action regarding the GMP/EIS that takes into account all viewpoints and preserves climbing at Great Falls Park. Please feel free to contact me, as a representative of FOGF, if you would like to discuss any of the points in this submission.

Thank you for the opportunity to comment

Sincerely,

Simon Carr, Friends of Great Falls

cc:

American Alpine Club
Potomac Mountaineering Club
SheClimbs
DCOutDoorsRockClimbing
SportRock
The Access Fund



wendfish@aol.com
12/15/2005 06:27 PM
EST

To: GWMP_Superintendent@nps.gov

cc: greatfallsaccess@gmail.com, Wendfish@aol.com

Subject: Comments on GMP/EIS-Great Falls

1543 6th Street, NW
Washington, DC 20001
wendfish@aol.com

December 14, 2005

Superintendent Audrey F. Calhoun
George Washington Memorial Parkway
National Park Service

RE: Comments regarding the draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Great Falls Park

Dear Superintendent Calhoun:

My name is Wendie White, and I've been a voting DC resident and rock climber for 2 years, having moved here from Colorado. I am writing because I am concerned about the potential negative impact the proposed GMP/EIS poses for rock climbing at Great Falls Park. While I recognize that recreational access must be balanced with proper land management in order to protect natural resources, I also believe it is important to note that Great Falls Park provides a unique recreational resource in the DC area. Specifically, Great Falls Park contains some of the closest, most popular and unique climbing opportunities within a three hour drive of Washington, DC. I feel strongly that the National Park Service needs to take steps to ensure that climbing remain accessible at Great Falls Park.

As National Secretary and DC/Baltimore Chapter Co-Coordinator of sheclimbs, inc., a North American women's rock climbing organization of over 350 members, I am especially interested in maintaining rock climbing at Great Falls, since most of our 150+ local members use the park to learn to climb, polish their skills, or just go out to have a great day of climbing. I personally visit the park several times each week during the spring, summer and fall months. I most often visit the park to rock climb and have been climbing at the park for over 2 years. I am also member of the Access Fund. Over the past two years, I have served on the Adopt-A-Crag committee at Great Falls Park with the help of Ranger Peter Lonsway. I have encouraged my sheclimbs members to participate in these all-volunteer events, which have brought together over 100 volunteers (mostly rock climbers) who have donated over 1,000 volunteer hours to maintain large stretches trails (including the ridge trail and river trail), as well as picked up trash in many acres of the park. We have provided erosion control work on trails, moved tons of gravel, and picked up tons of trash. As a frequent visitor and steward of the land at Great Falls Park, I support the efforts of the Friends of Great Falls and the Access Fund.

The National Park Service has proposed two choices for the GMP/EIS. With regard to climbing, as it is currently written, neither option provides a conservation stance that balances the protection of natural resources with recreational access. Alternative A is a bad management

choice for a variety of reasons and alternative B favors preservation of natural resources while sacrificing the recreational value of Great Falls Park.

Closure of Climbing Areas. Under both alternatives of the draft plan, the climbing areas commonly known as Gorky Park, Microdome, and Flat Iron would be closed to climbing. While I acknowledge that the National Park Service has a responsibility to prevent the destruction of the natural environment, I believe strongly that all steps taken to do so must be justified with sound, unbiased, scientific studies. Closures of any climbing areas in Great Falls Park must be based on scientific proof and it must be demonstrated that climbers are causing the destruction of the natural environment in these areas. As it is currently worded, the draft plan does not provide a sound, scientific justification for the closure of these three climbing areas. In addition, the National Park Service should explore all options to protect natural resources before closing a climbing area. I believe that in many cases, it is possible to protect natural resources by measures other than closing a climbing area.

Climbing Permits. I believe that it is important that the National Park Service avoid unnecessary and unreasonable management restrictions at Great Falls Park. The draft GMP suggests that permits may be used to control climbing access. However the draft plan does not provide details on how a permit system may be instituted. The use of a permit system to regulate access to climbing areas is unacceptable and these proposals should not be included in the GMP. I believe that a permit system does not serve the purpose of the GMP in balancing recreation and conservation.

The only time that a permit system would be acceptable would be in the case of using permits as an alternative to justifiably closing a climbing area. In this situation, I believe that it is important that climbing permits are free and available without advance notification or administrative procedures.

Climbing Anchors. The draft GMP also suggests that permanent anchors may be installed at Great Falls Park. Permanent anchors are not needed at Great Falls Park for safety reasons, nor should they be used to restrict access to climbing areas. If installed, climbing should not be restricted to locations with installed anchors nor should climbers be restricted to using permanent anchors. Any efforts to install anchors in Great Falls Park must be jointly coordinated with the local climbing community (i.e., Friends of Great Falls) and/or the Access Fund. Under no circumstances, should the National Park Service make unilateral decisions to install climbing anchors. In sum, climbing anchors should not be used to define a climbing area and efforts to add them should be discussed jointly with Friends of Great Falls and/or the Access Fund.

Climbing Management Plan. The draft GMP proposes a Climbing Management Plan (CMP). While climbing at Great Falls Park is a relatively small activity in the park, a CMP is both important and necessary. I support the National Park Services proposal to develop a CMP however the development of a CMP should be written jointly with the local climbing community (i.e., Friends of Great Falls) and the Access Fund. A successful CMP constructed jointly with Friends of Great Falls and the Access Fund will build cooperative relationships between climbers and the park service as well as articulate climbing as a valuable recreational experience at Great Falls Park. Friends of Great Falls and the Access Fund are a management resource and many of the first CMPs (e.g., Yosemite National Park, CA and City of Rocks, ID) have involved the climbing community.

Social Paths. The draft GMP suggests the closure of social paths in Great Falls Park. I feel that closure or development of social trails should be on a case-by case basis. Some social trails may

benefit the park by being designated and maintained. Development of trails may include the reduction of impacts to vegetation, the wildlife habitat, and water resources. I believe that any social trails that provide access to climbing areas should not be closed. If necessary, these trails may be re-routed to minimize impact while providing access to the climbing areas. By designating social trails that provide climbing area access, the park service can limit or stop trail proliferation. Additionally, designating these trails would contribute to the safety and ease of climbers reaching their objectives. Climbers are respectful of the need to protect the natural resources of Great Falls Park and I believe that climbers would be willing to use any designated trails to reach climbing areas.

I appreciate your time and consideration of my constituent interest with regard to the General Management Plan/Environmental Impact Statement for Great Falls Park. I am eager to hear what the outcome of my input will be on the future of rock climbing in the single most important crag in the DC area

Sincerely,
Wendie White
sheclimbs, inc.
National Secretary
DC/Baltimore Chapter Co-Coordinator

LOYD F. ATHEARN
DEPUTY DIRECTOR

December 15, 2005

Audrey F. Callahan, Superintendent
George Washington Memorial Parkway
600 Turkey Run Park
McLean VA 22101

Re: Comments on Great Falls Draft General Management Plan

Dear Superintendent Callahan:

The American Alpine Club appreciates the opportunity to comment on the Draft General Management Plan for Great Falls Park. This park is a tremendous natural resource that provides a wide variety of scenic and recreational values for the mid-Atlantic region. From a climbing perspective, Great Falls Park offers a wide range of climbing routes in a predominantly natural setting, and it has been a popular destination for local climbers for 85 years. It remains the most significant rock climbing destination within a three-hour drive of the nation's capital.

IMPACT ON AAC MEMBERS

The American Alpine Club, founded in 1902, is the premiere national organization representing the interests and concerns of American mountaineers and rock climbers. Since our inception we have worked to promote climbing knowledge, conserve mountain environments and serve the American climbing community. Beyond our work domestically, the AAC is the official representative of American climbers in the UIAA (Union Internationale des Associations d'Alpinisme), the International Mountaineering and Climbing Federation, an international representative body for climbers worldwide.

The AAC's current membership numbers about 6,500 individuals throughout the United States and abroad, including almost 250 in our Blue Ridge Section (Maryland, Delaware, Virginia, West Virginia and the District of Columbia). We also represent more than 40 climbing-related businesses that have joined our corporate membership program. Our members are frequent visitors to wilderness areas and National Parks, with members climbing an average of 74 days per year according to a membership survey conducted in 2000.

The AAC has worked closely with National Park Service officials throughout the country to craft regulations and management plans that protect natural resources while continuing to allowing appropriate primitive recreational activities like climbing. The NPS has a difficult mandate of protecting natural and cultural resources while simultaneously allowing recreational access. We have been and continue to be a resource for helping manage these multiple goals. Our efforts to develop, fund and implement a human waste removal program at Alaska's Denali National Park, for example, was recognized with an "Excellence Award" in 2002 from the National Park Service's Alaska Region, and we have developed leading partnerships in other National Parks where climbing occurs, including Yosemite, Mount Rainier, Grand Teton and others.

OVERALL OBJECTIVES OF THE GMP

The AAC generally believes your Draft GMP proposes reasonable objectives for preservation of multiple park resources and values at Great Falls Park. Where we have concerns, however, they stem from

inconsistencies between the stated goals and values and the proposed management actions, which in many cases seem to be in direct conflict with each other.

On page 2.1, the plan notes that NPS Director's Order #2 suggests that the alternative concepts proposed in a General Management Plan be "fundamentally different among competing sets of resource conditions and visitor experiences." However, preparing a GMP/EIS with only one action alternative and a clearly unacceptable "no action" alternative does not suggest much thought was devoted to developing a range of reasonable alternatives that provide differing alternatives regarding the Park's management. The Backcountry Management Plan for Denali National Park and Preserve, for example, contained four action alternatives as well as a no change alternative, each emphasizing significantly different resource values and uses. The lack of viable alternatives is disappointing, since a draft GMP should allow the public to help the NPS craft the vision for the park looking at multiple conflicting goals and potential uses.

The goals of Alternative A spelled out on page 2.3 call for preserving "traditional visitor experiences and activities" while maintaining the Park's "natural, cultural and scenic values." Alternative A would close significant portions of the Park to recreational access, including the climbing areas commonly known as Gorky Park, MicroDome and the Flat Iron, for reasons involving the potential for resource damage that is never fully explained nor actually proven in the document. All of these areas have had significant climbing activity for several decades. A 1965 guidebook to the area described the climbs on the Flat Iron as being "very popular between the 1930s and the mid-1960s." It is difficult to conclude how closing one of the most historic climbing areas in the Park constitutes preserving "traditional visitor experiences."

The overall goal for Alternative B is "balancing the opportunities for recreation at the park while protecting the sensitive natural resources and cultural resources." While this is a laudable goal and one the AAC wholeheartedly supports, the proposed management actions focusing on climbing do not show much "balance" at all in these dual park purposes. As in Alternative A, the long-used climbing areas of Gorky Park, MicroDome and the Flat Iron will be closed without specifically explaining how climbing activity in this area is damaging natural resources. Alternative B also will "designate with anchors and potentially reduce climbing routes, and control through permitting," which the GMP notes on page 4.12 will likely "increase competition for the reduced sites and add a layer of control that could require visitors to plan their trips in advance, possibly eliminating the ability of casual climbers to participate in this activity." Given that in all instances climbing appears to be closed or significantly restricted without adequately showing what damage it is doing to the natural resource, we conclude there is little balancing of uses being done in the draft GMP.

SPECIFIC CONCERNS WITH THE PREFERRED ALTERNATIVE

The AAC has significant concerns regarding the preferred alternative that range from the general to the specific.

A. Insufficient proof of natural resource damage

Climbing—whether on rock cliffs or alpine terrain—understand that our activities can pose conflict with natural and cultural resources. In most cases land managers working with climbing organizations have found reasonable compromises whereby natural and cultural resources can be protected—and in some cases improved—while maintaining appropriate recreational access. Seasonal roping closures, human waste "pick out" programs and closures near rock art in several parks and forests are but three examples of what climbers and land managers have been able to work out when the scope of problems are clearly defined. Objective information is provided about how human activity is affecting the natural resource and both sides look with an open mind towards a win-win solution rather than one that solves the problem through unnecessarily restrictive means.

While the overriding direction for the NPS is to balance human use with protection of the natural environment to ensure the resource remains "unimpaired" for the enjoyment of future generations, NPS management policy 8.1 notes: "The fact that a park use may have an *impact* does not necessarily mean it will *impair* park resources or values for the enjoyment of future generations" (emphasis added). Further, NPS management policy 8.2.2.1 notes that, "To the extent practicable, public use limits established by the

Service will be based on the results of scientific research and other available support data." Combining these management policies, one must conclude that 1) ample scientific evidence exists showing that an activity is causing unacceptable resource impacts before regulations are imposed, and 2) only when impacts become so severe that resources are threatened with impairment should these human uses be curtailed entirely.

The Great Falls Park CMP/EIS discusses in only the vaguest generalities the potential or perceived impacts climbers cause to park resources, which principally involve damage to rare, threatened or endangered plant communities. A Washington Post news report dated September 14 noted that Great Falls Park officials said there is "no evidence that climbers have damaged the rare plant life." The affected environment analysis for sensitive plant species seems to affirm this general assessment by noting that, overall, the riparian and terrace communities in the Gorge are considered to have "good visibility based on good size, good landscape placement, and the fair condition of resources." If any area of the park's plant resources appear to be affected, it is in the upland forest blocks where climbing does not occur. It is difficult to conclude from these statements that scientific evidence exists showing current climbing activities pose a threat to sensitive plant resources. (If such evidence does exist, it clearly has not been presented in the CMP/EIS.) Lacking this information, it is hard to conclude that climber-generated impacts are significant enough to warrant burdensome regulations, let alone outright prohibition in selected areas.

The park may not want to identify specific endangered plant communities for fear they will be damaged or removed. However, absent even general information about where these plant communities exist, what demonstrated impacts climbers have caused to date and how rock climbing or climbing access may pose possible future damage to the resource, the NPS provides climbers with no reasonable means of working to develop appropriate solutions to these potential problems. Climbers have been some of the most fervent conservationists responsible for protection of National Parks; development of the wilderness concept and progressively more stringent leave-no-trace practices, and most will willingly make changes to behaviors if they are shown to benefit natural resources. For example, if rare, threatened or endangered plant communities are damaged primarily by undesignated social trails to the cliffs or the walk-down routes to climbs, then one alternative could involve designating and improving access trails that keep climbers away from the plants or requiring climbers to rappel into certain areas. As it stands, there is no information given that allows such mutually agreeable compromises to be developed.

2. Failure to consider less restrictive regulations

Beyond concerns that significant visitor use restrictions are being imposed without adequate proof that climbing is damaging the natural resource, the AAC is also troubled that intermediate actions have not been tried or even proposed before use limits, mandatory permitting and outright closures are imposed. NPS management policy 8.2.2 requires that "Restrictions placed on recreational uses that have been found to be appropriate will be limited to the minimum necessary to protect park resources and values, and to promote visitor safety and enjoyment." Customarily this "minimum necessary" provision means that the NPS will first seek to address excessive or inappropriate visitor use impacts through visitor education or making minor improvements (i.e. establishing trails, hardening sites, etc.) to see if these less intrusive management actions will protect the resource. Only if these minimally intrusive actions are shown to be ineffective will park managers consider visitor use limitations or mandatory permitting, and use limits and permitting will be considered before resorting to a full closure.

Adequate evidence exists to show that climbing is an historic and appropriate recreational activity in both the National Park System and within Great Falls Park. Nevertheless, the swift movement from effectively no climbing regulations to very stringent regulations and outright prohibition without first trying less restrictive policies is very troubling because it does not follow either the letter or spirit of this policy.

3. Inconsistent response to visitor use impacts

The CMP appears disconcertingly inconsistent in terms of whether visitor use impacts are allowed to continue as whether natural resource impacts should result in regulation of certain recreational activities or outright closure of areas. As has been noted before, the draft GMP calls for the outright closure of some climbing areas and imposing a burdensome permitting process in other areas due to concern for potential

impacts to sensitive plant communities. However, the GMP shows remarkable inconsistency in this regard when on page 2.21 it notes that park planners studied the possibility of eliminating bicycles and horses from the Park's trail system due to the "potential for damage to sensitive natural and cultural resources," yet rejected this concept because it "would have reduced some of the recreational opportunities identified as important to the public."

Without question there are greater opportunities outside of Great Falls Park for bicycle riding and equestrian use in the mid-Atlantic region than there are for rock climbing. The GMP on page 3.4 also notes that climbing is a more frequently participated in activity within the park than either of these two uses. (Horseback riding came in third last.) Thus, it seems remarkably inconsistent and extremely troubling that the draft GMP rejects limits on these recreational uses, which evidently pose similar resource concerns, affect fewer park visitors and where alternate areas exist outside of the Park, while proposing stringent regulations and outright closure of an activity that sees greater use and fewer alternate locations.

4. Insufficient rationale for mandatory permitting

Mandatory permitting for climbing exists at only a handful of significant climbing destinations throughout the country, usually in high-altitude mountain locations possessing complex natural hazards, fragile alpine terrain and complicated (and expensive) human waste disposal/removal programs required to handle large numbers of climbers who must camp in these fragile areas for several days. The permitting process in these locations provides opportunities for mountaineering rangers to discuss current conditions, known safety hazards, manage human waste and trash removal programs and provide a trained and capable rescue infrastructure that can come to the aid of climbers when the need arises. None of these factors appears to be a concern at Great Falls Park where day-use climbing is not sufficiently different from hiking, picnicking, general lightening or other similar activities to justify some actions.

The GMP has not sufficiently spelled out why rock climbing park visitors must be permitted. The "visitor experience" analysis on page 2.15 notes that the Mather Gorge zone would be managed to, among other things, "protect employees and visitors," so one must infer that the permitting is for safety reasons. However, the "visitor safety" section on page 3.12 notes that "most victims are visitors engaged in passive recreational activities who had come to picnic, view the falls and fish, rather than visitors engaged in active recreational activities such as kayaking or climbing." Thus, it would seem counterintuitive to require mandatory permitting of climbers for safety reasons when it is non-climbers—who would not be forced to obtain permits—who are the ones generally falling victim to the park's natural hazards. If the rationale behind mandatory permitting is to protect the natural resource, as has been noted before, there is insufficient evidence linking climbing impacts with documented resource degradation, and the draft GMP fails to explain how mandatory permitting will prevent resource damage that cannot be mitigated through educational programs, minor site hardening or alternate means of access to climbing destinations (i.e. developed pathways, rappel access, etc.)

The AAC has reason to be concerned about any mandatory permitting program since all of the locations where it currently exist charge permit issuance fees ranging from roughly \$15 to \$200. Experience tells us that any mandatory permit system will eventually lead to permit issuance fees, and the draft GMP has failed to explain why day-use climbing requires a mandatory permit and how climbing differs from other day-use park activities.

5. Management of social trails

The AAC is well aware of the significant resource impacts that can occur through uncontrolled proliferation of social trails. However, we are also well aware that access to many climbing destinations nationwide occurs via undesignated trails, so the NPS must be judicious about how and when non-system trails are closed. The proposed inventory of all social trails and the general guidance to "remove most social trails" does not seem to differentiate between pointless social trails that provide shortcuts across sensitive vegetation versus necessary climber access trails.

6. Designating climbing sites with anchors

Fixed anchors (pitons, bolts and nylon slings left in situ) have played a legitimate and necessary role in enhancing climber safety since technical rock climbing first reached this country in the early 1900s. Initially fixed anchors were the only form of climbing protection in widespread use, but in the early 1970s climbers began developing and using removable (and less damaging) protective devices that were utilized in certain situations where the natural terrain allowed their use. The handful of references to "designate climbing sites with anchors" leaves us perplexed about exactly what you are proposing. Is this designating fixed anchor rappel anchors so that climbers can access some cliffs without utilizing descent trails to the riverside that may endanger sensitive plant communities? The draft GMP is entirely unclear.

The AAC believes that decisions involving climbing protection should be left principally to climbers themselves. If the NPS has concerns about inappropriate or cumulative impacts associated with climbing anchors, then these should be brought to the attention of the local climbing community and potentially managed through a Climbing Management Plan. The AAC would oppose any action taken by the NPS regarding climbing anchors at Great Falls Park that has not been thoroughly discussed with representatives of the local climbing community.

CONCLUSION

The AAC opposes Alternative B, your preferred alternative, since it does not sufficiently build the case for most of the climbing-specific regulations contained in this alternative. Far from showing damage is occurring, it is difficult to conclude based on the evidence contained in the draft GMP that current climbing practices are having any significant impact on the park's natural resources and values. In most cases it appears that you have come up with solutions to solve problems that have not been adequately shown to exist.

While making no change to current management practices means that you will not be able to address other pressing park problems, we believe it is preferable to rethink your action alternatives that to proceed ahead with a fairly flawed document. We welcome the opportunity to work collaboratively with you to help create additional alternatives or to refine the current plan so that proposed management actions are based on defensible approaches and supported by relevant data. Lacking this we find it impossible to support Alternative B, the park's preferred alternative, in this draft General Management Plan.

Regards,

LLOYD F. ATHEARN
DEPUTY DIRECTOR

PHONE: 303.384.0110 X13
E-MAIL: LATHEARN@AMERICANALPINECLUB.ORG

December 15, 2005

Jon James, Acting Superintendent
Deborah Feldman, Park Planner
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Dear Mr. James and Ms. Feldman:

We are writing this letter on behalf of the Great Falls Citizen Associations (GFCA), with a membership of 600 individuals representing the local community interests of Great Falls, Virginia. The GFCA is dedicated to preserving and protecting the historic, low-density, semi-rural character of the community and its natural resources. Great Falls National Park is very much a part of the cherished character and heritage of the Great Falls community.

We support Alternative B but with the following recommendations/reservations.

Trails

-We agree that trail connectivity is an important aspect of the new plan. Linkages to the Potomac Heritage, Cross County, Georgetown Pike and River Bend Trails will do much to provide a diversity of access points and transportation modes to enter the park. These trails should help to reduce automobile traffic on park heavy use days and may reduce the possibility of new social trails being created.

-These trails need to be consistent with the Fairfax County Comprehensive Trail Plan. They should be distanced from any roadway by a barrier of vegetation and they should meander to reflect a more natural feeling and to protect trees along the path. The ultimate goal would be to connect the Madiera property with River Bend Road via park trails.

-We urge that the park staff explore the possibility of getting additional funding for River Bend Road and the Georgetown Pike Trails by working with Great Falls Trail Blazers as they pursue funding for local trails.

-Both social and established trails should be left in place unless they negatively impact sensitive natural communities or cultural resources. Trails exist because people are using those paths. Any consideration of elimination of trails must be done on a case-by-case basis after a thorough documentation of the natural or cultural resource which is endangered. An explanation of the reason for the trail closure and relocation to a sustainable area will prevent new social trails in inappropriate locations.

Construction of buildings and parking lots

We understand the need for additional space for park staff and park services. However we urge you to re-use the existing space to the extent possible. We

also urge that any new building on the park site utilize green building and low impact design techniques. Any construction at the park should be a model of environmental stewardship.

Educational signage in the Park

There are unique and significant natural resources in the Park: the basic oak-hickory forest on the higher terraces, the bedrock terrace, bedrock floodplain and swamp. While the Park does have educational signs on the cultural and historical aspects of the park there is no signage about these rare natural communities and the need for their protection. We urge the creation of such signage.

Formation of the Friends of Great Falls National Park

We support the formation of a Friend of Great Falls National Park group. We think such a group could be composed of individuals and members of various user groups and would assist in bringing everyone together in stewardship activities to aid park staff.

Non-native Invasive plants

There is no mention in this plan of any effort to develop an Invasive Plant Management Plan. We urge you to do so and to invite and involve other organizations and citizens in creating such a plan and in removal efforts.

Traffic Advisory Signage outside the Park

The GFCA is adamantly opposed to any electronic signs on Georgetown Pike and in the Great Falls area. Part of the character of Great Falls is the absence of any electric signage along the Pike and lack of significant electronic signs at shopping centers in Great Falls. We urge you to explore options like a recording that changes hourly that people can call or some posting on Park web sites that lists park accessibility at any given hour.

Permitting of specific user groups

The GFCA is opposed to the permitting of any specific user group. Part of the challenge of this park is to balance the protection of natural and cultural resources with recreational opportunities. We suggest that special outreach materials be developed which would contain tips on good stewardship for each user group.

The Great Falls Citizens Association shares with the Park Service a dedication to enhance and preserve the natural and cultural resources of this area. We thank you for the opportunity to comment on the Draft Management Plan. We look forward to working with the Park staff as they implement the new Plan.

Sincerely,

Stella Koch, and Robin Rentsch
Co-chairs, Great Falls Citizens Association Environment, Parks and Trails Committee

12/15-27

To: gwmp_superintendent@nps.gov
cc: erick_porter@nps.gov, greatfallsaccess@gmail.com
Subject: Access Fund Comments on the Draft GMP/EIS for Great Falls Park

"Shawn Tierney"

-shawn@accessfund.org

g?

12/15/2006 12:52 PM

MST



VIA EMAIL

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

December 15, 2005

Re: The Access Fund Comments on the 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

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

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.

Great Falls Park, VA

Comment Form



George Washington Memorial Parkway, VA
National Park Service
U.S. Department of Interior

Please use this form to record your comments regarding the Draft General Management Plan and Environmental Impact Statement for Great Falls Park, VA. If you need more space, please attach additional pages to this form. When finished, fold the form on the line, tape it closed, and mail. No postage is required. In order for your comments to be considered, please mail this form back by November 15, 2005 (postmarked).

Our practice is to make comments, including names and home addresses of commentators, available for public review during regular business hours. Individuals may request that we withhold their home address from the Record, which we will honor to the extent allowable by law. There may also be instances in which we would withhold a commentator's identity, as allowable by law. If you wish to withhold your name and/or address from the Record, you must state this prominently at the beginning of your comments. Thank you.

As president of the George town Pk & Potomac River Ass'n, I wish to express our opposition to the proposed placing of message boards at any kind along the Georgetown Pkce, Virginia's first scenic and historic by-way - these would be detrimental to the preservation of the natural and scenic character of the historic park.

Clear association is a strong supporter of this park and the other 10 parks along the eleven-mile historic by-way - Please feel free to call me at any time for any assistance you may seek and if you wish to discuss further our concern in the message boards.

Thanks for all that you do!

John Adams

202-955-1512
703-893-8573

Please provide your name and address to be added to our mailing list. Thank you.

John Adams, President of the Georgetown Pk & Potomac River Ass'n
Your name, Title

8546 George town Pkce, McLean, Va 22102
Street Address, City, State, Zip

Comment Form, Great Falls Park Draft GMP/EIS