

Concern Response Report
Shenandoah National Park
Rock Outcrop Management Plan
Environmental Assessment/Assessment of Effect

The Shenandoah National Park (Park) Rock Outcrop Management Plan (ROMP) Environmental Assessment/Assessment of Effect (EA/AoE) was released for agency and public review beginning on November 12, 2012 and ending on January 12, 2013. A press release was published announcing the availability of the ROMP EA/AoE during the 62-day public review and comment period.

The Park received eighty-eight pieces of correspondence during the public review period, all of which were entered into the NPS's web-based Planning, Environment and Public Comment (PEPC) system, either directly by the commenter or through the uploading of comments that were submitted in hard-copy form to the park. The comments were then analyzed through a comment analysis process.

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by the park. It also aids in identifying the topics and issues to be evaluated and considered when finalizing the ROMP. The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature. Analysis of the public comments involved the assignment of the codes to substantive comments (questioned, with a reasonable basis: the accuracy or adequacy of the EA/AoE; presented reasonable alternatives other than those contained in the EA/AoE; or caused changes or revisions in the proposal, requiring a response) made by the public in their letters, email messages, and written comment forms. This concern response report

contains the codes, substantive comments which are summarized in a concern statement, representative quotes, and the Park's responses to the concern statements. The representative quotes are quoted exactly as provided by the commenter. Grammar and/or editorial mistakes have not been corrected.

Although the analysis process attempts to capture the full range of public concerns, this concern response report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a comment was received.

Shenandoah NP
Rock Outcrop Management Project
Rock Outcrop Management Plan Environmental Assessment / Assessment of Effect 2012
Concern Response Report

AL10000 - Alternatives: Support Alternative A

Concern ID: 51187

CONCERN STATEMENT: One commenter stated the NPS should choose Alternative A because the Park is unable to effectively implement or enforce other Alternatives in the ROMP or the CMG.

Representative Quote(s): **Corr. ID:** 73

Organization: *Not Specified*

Comment ID: 332801

Organization Type: Unaffiliated Individual

Representative Quote: I would recommend that Shenandoah National Park seriously reconsider Alternative A to the 2012 ROMP. Shenandoah National Park cannot and will not be able to effectively put in place any other alternative to the 2012 ROMP. Shenandoah National Park does not have the financial resources or manpower to effectively manage any other alternative. I would strongly recommend that Shenandoah National Park not add any restrictions on rock climbing within the park that as a day-to-day practical matter would not be enforceable.

Response: Alternatives analyzed in the EA/AoE are technically and economically feasible. The NPS would not have presented an alternative in the EA/AoE for analysis if we thought it could not be implemented. When the alternatives were developed, if an alternative could not be implemented, it was dismissed, so only feasible alternatives were analyzed in the EA/AoE. The NPS understands the commenter's concerns, given budget constraints in recent years, but the NPS believes that any of the alternatives presented in the EA/AoE can be implemented as described.

AL12000 - Alternatives: Access to Climbing Areas

Concern ID: 51189

CONCERN STATEMENT: One commenter requested that actions at rock outcrops be limited to protecting natural resources and not done for the purpose of improving access to climbing areas.

Representative Quote(s): **Corr. ID:** 2

Organization: PATC, PATC-MS, Access Fund, Mid Atlantic Climbers, SNPA

Comment ID: 305944

Organization Type: Unaffiliated Individual

Representative Quote: I would hope that any climbing-oriented physical changes resulting from this planning process (for example, the "hardening" of the chute trail at Little Stony Man) be limited in scope and design to what is necessary to limit or reverse impacts to the natural environment, and that they not be implemented in order to make climbing easier or more accessible to a larger group of park visitors. In keeping with a backcountry/wilderness-emphasis of climbing in the park, you should have to "earn" access to the park's climbing routes, even if it means traversing tricky or strenuous trails, or learning to build top-rope anchors with removable protection rather than relying on fixed cliff-top bolts.

Response: The actions within the alternatives have been designed to provide protection of natural resources in a way that minimizes impact from all types of visitor uses. The

proposed actions are not targeted specifically to climbers or designed to improve or not improve climbing areas or access in the park.

AL14000 - Alternatives: Keep Areas Open to Climbing

Concern ID: 51190

CONCERN

STATEMENT:

Commenters stated the park should protect vegetation, allow limited access to outcrops and keep areas open specifically for climbing because climbers are a small percentage of park users and the park contains climbing opportunities that are not available elsewhere in the region.

Representative Quote(s):

Corr. ID: 11

Organization: *Not Specified*

Comment ID: 305991

Organization Type: Unaffiliated Individual

Representative Quote: Clearly environmental protection and management are warranted. In my opinion, this plan makes sense. Management is necessary but I would urge not to go for overkill in areas that are prime exhibits of the wonders of Shenandoah National Park, either. Perhaps a limit on which days certain trails and outcrops are open to the public.

Corr. ID: 53

Organization: *Not Specified*

Comment ID: 307143

Organization Type: Unaffiliated Individual

Representative Quote: Make up only a small percentage of rock outcrop users, the park should consider the possibility that some climbing access could be allowed, even if other user groups are not. Park planners should consider ways to protect the natural resources without prohibiting access to climbing. Climbers have a rich history in Shenandoah National Park, and this history should be preserved as much as possible.

Corr. ID: 55

Organization: *Not Specified*

Comment ID: 307144

Organization Type: Unaffiliated Individual

Representative Quote: My only concern is the closing of of the Hawksbill Summit and North Slope to climbing activities. Acknowledging that these areas have sensitive flora and fauna, I propose that winter climbing activities (i.e. ice & alpine) be allowed not spring, summer, & fall climbing activities. Human travel on snow & ice has minimal impact on vegetation. I believe this amendment is in the spirit of Alternative B, providing protection for sensitive natural resources while allowing climbing access to one of the few areas in the mid-Atlantic that has alpine conditions.

Corr. ID: 67

Organization: Access Fund

Comment ID: 308632

Organization Type: Unaffiliated Individual

Representative Quote: I recognize that recreational access at Shenandoah National Park must be balanced with proper management (which may include restrictions) to protect the integrity of rock outcrops. However, it should be noted that Shenandoah National Park contains unique, popular, and challenging technical climbing opportunities in the region. As a climber, I am concerned with the preservation of these opportunities and believe the National Park Service should keep in mind these climbing opportunities when selecting its management alternative and implementing that decision. There is no other climbing area in the region that offer the type of climbing experience that is available at Shenandoah National Park and this recreational value should be emphasized in any management initiative that is established.

Corr. ID: 79

Organization: American Alpine Club

Comment ID: 309903 **Organization Type:** Unaffiliated Individual

Representative Quote: The ROMP also proposes a complete ban on climbing on Hawksbill. Although this area is not as popular as LSM and Old Rag, there is increasing interest in winter climbing in this area, as this is one of the few locations in SHEN that allows this. We recognize from the ROMP that there are important environmental resources at Hawksbill; however, we do not feel that the document has adequately discussed alternatives that might allow environmental protection objectives to be met while permitting climbing activity to continue. The need for a blanket ban on climbing activity seems unsubstantiated. Consequently, we would encourage the NPS to review with the local climbing groups whether there are options that permit both NPS objectives to be met for environmental protection while retaining climbing access.

Response:

The NPS has done extensive research on current conditions at rock outcrops and created alternatives that reflect the necessary actions to protect the resources. The EA/AoE document is clear in referencing the conclusions of various studies and research undertaken in support of the ROMP that visitor use at rock outcrops results in damage to natural resources. As explained on pages 10-23 on the EA/AoE, the park has evaluated impacts to rock outcrops and identified areas that need immediate protection. The proposed closures of portions of three outcrop areas (three out of over two thousand known outcrop areas open to public use) have been recommended because the areas have exceptionally rare natural resources that are very sensitive to human impacts, and can only tolerate extremely limited disturbance. Closures are proposed because there is no other option available to protect natural resources. Other areas in the park are open to visitor use and recreational activities, but areas identified in the ROMP that have sensitive biological resources in need of protection will be closed.

Although information indicates that climbing is a relatively small part of the visitation occurring at outcrops, climbing is a recreational activity that focuses on some of the most sensitive vegetation areas of outcrops. Climbing will still be an activity available in most areas of the park, but areas that have sensitive biological resources in need of protection will be closed to all off-trail visitor uses.

AL4000 - Alternatives: New Alternatives Or Elements

Concern ID: 51191

CONCERN STATEMENT: Commenters had concerns about various aspects of the plan and suggested several additions to alternatives that would protect outcrops while improving access, recreation, and interpretive signage.

Representative Quote(s): **Corr. ID:** 41 **Organization:** Access Fund

Comment ID: 306552 **Organization Type:** Unaffiliated Individual

Representative Quote: Because climbers make up only a small percentage of rock outcrops users, decisions to restrict access to specific rock outcrops (especially those on the "watch list") should consider if some climbing access can be allowed even if other user groups are restricted or otherwise more directly managed. Park planners should consider ways to protect the natural resources without prohibiting access to climbers completely.

Corr. ID: 88 **Organization:** Retired lawyer

Comment ID: 309933 **Organization Type:** Unaffiliated Individual

Response:

Representative Quote: The National Park Service (NPS) should continue to advocate a balance between recreation and conservation of resources. Recreational needs must be clearly recognized, however, including a focus on trails, traffic, parking, roads, access to water, restroom facilities, administration and operations related to rock climbing and mountaineering. Please consider these comments in supporting a balance as mandated for national parks between conservation of resources and recreational uses, including rock climbing and mountaineering. The ROMP EA/AoE is a comprehensive document addressing actions that need to be taken to protect rock outcrops in the Park. The NPS mission is to conserve resources while providing for public enjoyment of these resources. However, NPS Management Policies is clear that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. Further, the NPS has authority to take management actions to prevent harm to resources when managers become aware of problems, not necessarily when the problems have become large or obvious. The proposed closures of portions of three outcrop areas (three out of over two thousand known outcrop areas open to public use) have been recommended because the areas have exceptionally rare natural resources that are very sensitive to human impacts, and can only tolerate extremely limited disturbance. Closing and restricting access to rock outcrops is an action of last resort, and is proposed because there is no other option available to protect natural resources.

Closure boundaries were selected to protect natural resources, and provide the minimum possible disturbance to park visitor recreation. Field meetings with the public were conducted in 2006, and were used to identify the most popular climbing routes and access points on Little Stonyman and Old Rag. All closure areas were tailored as much as possible to protect access to popular areas, while also providing adequate resource protection. In addition, though off-trail uses will not be allowed in the closed area of Little Stonyman, access to the "chute" trail will be maintained and the trail's condition improved. The closure on Old Rag impacts only the crown of the western summit, and does not restrict access to the cliff faces below the summit. The closure on Hawksbill encompasses a complex of rock outcrops on the mountain's summit and north/northwest face. This area is the largest remaining pristine examples of the High Elevation Greenston Outcrop Barren plant community, a globally rare and park endemic plant community, as well as supporting other rare natural resources. The Hawksbill summit provides prime nesting habitat for Peregrine falcons, and the north slope of the mountain is one of only five sites in the world with occurrences of the globally rare Central Appalachian Mafic Boulderfield plant community, and rare wildlife. Human impacts have been observed on the Hawksbill north slope and summit, and the closure is being implemented to assure that this irreplaceable area is protected from further degradation.

The NPS noted the suggested additions to the alternatives and will consider them in the years ahead to improve management of rock outcrop resources.

AL7000 - Alternatives: Relocating the Appalachian Trail

Concern ID:

51192

**CONCERN
STATEMENT:**

Representative Quote(s):

Commenters made suggestions to relocate the Appalachian Trail (AT) to eliminate conflicts between users.

Corr. ID: 75

Organization: PATC/MS

Comment ID: 309872

Organization Type: Unaffiliated Individual

Representative Quote: A solution, regardless of any decision to relocate the Appalachian Trail from its current position at the top of Little Stony Man, would be to abandon the portion of the AT that runs along the very top of the cliffs.

This relocation "short cut" is obvious when you look at the Little Stony Man Figure #1 on page 158 of the 2012 ROMP.

In the real world, starting at the Little Stony Man parking area near Mile Post 39 and walking south on the AT toward the cliff top, there is at the topmost switchback just before reaching the cliff top, an old iron post with a small "No Camping" sign in the woods approximately 50 feet south of the AT. Approximately 50 feet through the woods beyond this sign you re-emerge onto the AT just south of the top of the "Chute Trail". This easy relocation would require only 100 feet of level trail, at an area where there is already an informal trail in place.

This has been a desirable camping place in the past because it is a flat area.

This short relocation and the abandonment of the existing Appalachian Trail along the Little Stony Man cliff top would eliminate the problem with using slings on trees for top rope anchors, which in turn would eliminate any need for bolted anchors along the cliff top.

If there is no maintained trail along the cliff top, there is no "trail" for the anchor slings to cross. This otherwise reasonable regulation could remain in effect for other areas in the park.

Response:

As stated in the EA/AoE on page 34, the proposed action to relocate the AT to the Passamaquoddy Trail is to reduce visitation and impacts on the upper cliffs of Little Stony Man. As stated in the EA/AoE, the purpose of relocating the trail is to protect rare natural resources and not to separate recreational areas between climbers and hikers. A trail will still be maintained along the top of the cliffs; however, as stated in the description, visitor traffic will be directed to the lower cliff area, thus mitigating some of the impacts to the rare cliff-top resources. Items articulated in the Climbing Practices section of the Climbing Management Guidelines on pages 155 - 157 will still guide the installation and use of various types of anchors on Little Stonyman after the Appalachian Trail relocation.

CG6000 - Climbing Management Guidelines: New Elements

Concern ID:

51194

**CONCERN
STATEMENT:**

Commenters suggested additions to the Climbing Management Guidelines (CMG) including a discussion of climbing ethics and the physical benefits of climbing, preserving the park as a climbing wilderness destination, and authorizing the use of motorized equipment to specific organizations.

Representative Quote(s):

Corr. ID: 2

Organization: PATC, PATC-MS, Access Fund, Mid Atlantic Climbers, SNPA

Comment ID: 305942 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to suggest that even greater emphasis be placed in the proposed Climbing Management Guidelines on preserving SHEN as a backcountry/wilderness-oriented climbing destination. Many elements of Alternative B and the proposed guidelines seem to touch on this issue (e.g. limiting additions of fixed protection, excluding the addition of fixed top-rope anchors at Little Stony Man), but the topic should be addressed even more explicitly.

Corr. ID: 2 **Organization:** PATC, PATC-MS, Access Fund, Mid Atlantic Climbers, SNPA

Comment ID: 305943 **Organization Type:** Unaffiliated Individual

Representative Quote: While I recognize that many climbers would consider a broad discussion of climbing ethics within a regulatory document to be treading on dangerous ground, the unique place that SHEN represents in the Mid-Atlantic climbing landscape seems to warrant such a discussion. The Climbing Management Guidelines should explain the SHEN offers some of the only opportunities in the region to climb in relatively remote and undisturbed areas, offering an experience that can approach the alpine climbing usually associated with more obviously exotic locales. Such a discussion would demonstrate that the guidelines and regulations are meant not only to preserve sensitive natural resources, but also will help to preserve the park's climbing areas as places where climbers can experience the same sense of adventure enjoyed by first ascensionists - absent the intrusion of unnecessary fixed protection, excessive chalk marks, gardened cracks, and other markers of prior human visits. By clearly demonstrating that some of the proposed guidelines and "restrictions" would actually enhance, rather than detract from, elements of the climber's experience, this type of discussion could go a long way towards furthering climbers' acceptance of and adherence to the guidelines.

Corr. ID: 76 **Organization:** *Not Specified*

Comment ID: 309890 **Organization Type:** Unaffiliated Individual

Representative Quote: Motorized Equipment, pg 156 4.3.5 should contain a clause for the park to authorize the use of motorized equipment to specific organizations perhaps stating the following. The use of motorized drilling device used for the purpose of placing bolts, anchors or climbing equipment is prohibited, except through authorization from the park service and only through organized climbing groups for the purpose of setting anchors to reduce environmental impact.

Corr. ID: 88 **Organization:** Retired lawyer

Comment ID: 309945 **Organization Type:** Unaffiliated Individual

Representative Quote: To balance recreation with conservation activities in the park, the NPS should ensure recognition and encouragement of physical exercise. The NPS should condone the appropriateness of climbing as a source of healthy exercise and as an expression of personal experience. Guidelines and policies should focus more clearly on the benefits of climbing and not focus only on possible adverse effects of climbing.

Response:

The main purpose of the CMG is to provide guidance for park managers on climbing at Shenandoah National Park. CMG were included in the ROMP since many rock outcrops include recreational climbing. The focus of the CMG is to provide brief guidance for resource protection in the ROMP areas. Existing management plans such as the Park's Backcountry and Wilderness Management Plan neglected to address climbing, and including climbing information in the ROMP was viewed as a logical and streamlined way to correct this omission. Of

course, motorized use is prohibited in any of the park's designated wilderness. Additionally, motors, no matter how small are generally prohibited in the backcountry (36 CFR 2.12). A greater discussion of climbing resources, ethics and the benefits of climbing are topics for a comprehensive plan dedicated to climbing and are outside the scope of Guidelines for Shenandoah National Park. For an overview of how climbing is regulated in the National Park System see the Code of Federal Regulations (36 CFR).

CG7000 - Climbing Management Guidelines: Allowing Bolting and Anchors in the Park

Concern ID: 51195

CONCERN

STATEMENT:

Commenters suggested the park allow the placement of permanent anchors, bolts, and top rope anchor slings to provide safe climbing conditions and provide greater protection for vegetation.

Representative Quote(s):

Corr. ID: 5

Organization: PATC-MS

Comment ID: 305946

Organization Type: Unaffiliated Individual

Representative Quote: Some significant changes were made especially in regards to Top Roping access at Little Stony Man. This is a well known and much loved crag in the Shenandoah and the "preferred" option would all but eliminate Top Rope climbing at LSM as I've read it. The author has stressed how important preserving cliff top vegetation is<redacted> which I understand<redacted> but then has completely omitted the most obvious way to alleviate that stress AND maintain climber's access to the cliffs. By allowing and placing permanent anchors the NPS could create a win/win for all stake holders. This is such an obvious answer and so easy to do. Parks up and down the east coast are doing this at cliff tops to preserve vegetation and minimize climber impact, why not here?

Corr. ID: 75

Organization: PATC/MS

Comment ID: 309871

Organization Type: Unaffiliated Individual

Representative Quote: Alternative B both eliminates the use of top rope anchor slings that would cross the Appalachian Trail, therefore eliminating the use of trees as the safest and easiest anchors and it also prohibits the permanent placement of any bolts that would be visible from the trail.

This would allow only for top rope belay and /or rappel anchors that would be provided by placing temporary, removable protection such as cams, hexes, or stoppers. This is, in general, beyond the skill-set of most climbers who use this area. Attempts at rigging an anchor like this by someone who is not proficient in their use puts them at risk at the very edge of the cliff top, and is an extreme safety risk to any climber using a belay anchor that is not 100 % I believe that allowing the placement of permanent bolted anchors at the top of the Little Stony Man cliff as a solution to this problem is highly undesirable.

The best current technology could provide for stainless steel bolts that would have a maximum safe life of 25 years (American Safe Climbing Association)when used appropriately . Abuse or misuse of these anchors, which is common even in areas with many bolted "sport climbs", can reduce the safe life of the best correctly placed bolted anchor to only a year or two. The occurrence of this sort of mis-use at Little Stony Man by climbers unfamiliar with bolted anchors is highly likely.

Response:

As stated on p.156, Appendix D, "the placement of new fixed belay/rappel stations

will be prohibited when the ability to place adequate removable protection is available." Rock features at popular climbing routes such as those at Little Stony Man adequately provide for the use of removable protection for belay and rappel. The placement of new fixed hardware, bolts, and pitons should be rare in the park, to include wilderness areas and prominent rock outcrops, in order to protect park resources. In instances where cracks and rock features will accept removable protection, climbers should utilize this method. In rare instances where the rock face will not allow for the adequate placement of removable protection, the limited installation of fixed protection would be acceptable.

Fixed anchors are not prohibited in the park. The use of removable and fixed anchors, as well as other climbing equipment, can occur in some circumstances. Fixed anchors must be placed judiciously and closely managed in order to prevent the degradation of park resources, and should be rare in wilderness areas. Where anchor points are necessary for climber safety, the use of removable equipment is desired and highly recommended. Using removable protection does less damage to the resource and does not leave a lasting impact unlike drilling or hammering a rock face to insert bolts or pitons.

In Appendix D, on p. 155, the Climbing Management Guidelines state "The placement of new fixed anchors requiring rock alteration for installation will be prohibited when the ability to place removable protection is available". To clarify, fixed anchors should not be placed merely for convenience or to make an otherwise "unclimbable" route climbable. For example, the placement of new fixed anchors may be allowed when necessary to enable a safe rappel when no other means of descent is possible, to enable emergency retreat, or during self-rescue situations. The infrequent placement of new fixed anchors is allowed when rock features capable of accepting adequate removable protection are not present. New, bolt-intensive climbing routes (e.g., sport climbs, bolt ladders) are not appropriate and not in keeping with the history and ethics of climbing in wilderness areas or in the park. The park will not install fixed anchors or rappel stations as it is not the policy or practice of the National Park Service to do so.

The park recognizes the convenience of top roping off of trees and does not prohibit such anchoring, except for, as noted on p. 156, Appendix D, "if such use causes interference with any park-maintained trail. Interference includes any rope or webbing that extends across a park trail, whether elevated off the ground or not." Presently, top roping off of vegetation at Little Stony Man impacts the Appalachian Trail and would be prohibited.

GA1000 - Impact Analysis: Additional Analysis Required

Concern ID: 51196

CONCERN STATEMENT: Commenters are concerned about unnecessary broad and long-term closures to climbing areas and request additional analysis for impacts by user group, impacts for individual outcrops, justification for closures and how the closure will restore a given resource because climbers believe climbers have fewer impacts than other user groups.

Representative Quote(s): **Corr. ID:** 2

Organization: PATC, PATC-MS, Access Fund, Mid

Comment ID: 305941 **Organization Type:** Unaffiliated Individual

Representative Quote: While I would acknowledge, without hesitation, that these Category 1 outcrops are in need of some action to reduce visitor impacts, the EA does not appear to explain exactly why the relatively minor impacts caused by the few climbers that climb at these outcrops would require the drastic measure of completely closing areas to climbing. Based on my own observation, it seems the high level of impact at these Category 1 areas is disproportionately attributable to novice non-climber visitors (generally due to the easy accessibility of these areas to such visitors), with little to no impact discernibly resulting from the few climbers who may occasionally climb at such outcrops.

Corr. ID: 39 **Organization:** *Not Specified*

Comment ID: 306548 **Organization Type:** Unaffiliated Individual

Representative Quote: I have some concern regarding the lack of differentiation of impacts on the area from specific user groups. For example, the impact of day hikers vs. climbers. It is my understanding that climbers make up a small percentage of area users and thereby are responsible for a negligible percentage of negative impact on the area. I wonder if there may be some possible alternatives that identify specific outcrops that see use predominantly by climbers. How are these areas impacted as compared to those that see a higher volume of non-climber traffic? Could these climber-specific areas be regulated differently than general use areas? Regarding outcrops in higher traffic locations; could signage or barriers be implemented restricting traffic beyond a certain point to climbers only, thereby greatly reducing user impact? How much impact has there been on the cliff faces themselves vs. the cliff tops? I would additionally suggest that more information be included in the report regarding the specific impacts that would require any suggested cliff closures. I believe including this information would either engender more public support of any closures or lead to suggestions for viable alternatives that may not have yet been conceived. I appreciate the opportunity to comment on this process.

Corr. ID: 41 **Organization:** Access Fund

Comment ID: 306551 **Organization Type:** Unaffiliated Individual

Representative Quote: The ROMP provides general information about the impacts causing concern, but more information about the specific concerns at any particular rock outcrop that has restrictions or for which restriction are being considered should be provided. Hawksbill is an example where climbing is prohibited but the concerns leading to the decision are not fully explained. More detailed information will allow for better understanding of the need for restrictions and may allow for a less restrictive management approach.

Corr. ID: 49 **Organization:** *Not Specified*

Comment ID: 307044 **Organization Type:** Unaffiliated Individual

Representative Quote: I fail to see any specific information or evidence in this document on how climbing and climbing related activities have caused harm to the park and its resources. Protecting threatened and endangered species is important and steps should be taken to safeguard them if the park identifies an area where climbing activities pose an immediate threat. If specific evidence can be provided as to how climbing poses an immediate danger to any area of park and its resources, then other alternatives should be considered.

Corr. ID: 67 **Organization:** Access Fund

Comment ID: 308635 **Organization Type:** Unaffiliated Individual

Representative Quote: Consequently, more information should be provided about the specific impacts at each rock outcrop where restrictions are being considered. As currently written, the ROMP has several areas closed to climbing including Marys Rock, North Marshall, Hawksbills Summit, West Summit of Old Rag, and parts of Little Stony Man. Each of these areas needs specific and sound justification before climbing restrictions are implemented.

Response:

The NPS mission is to conserve resources while providing for public enjoyment of these resources. However, NPS Management Policies are clear that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. Further, the NPS has authority to take management actions to protect resources when managers become aware of problems, not necessarily when the problems have become large or obvious. We have done extensive data gathering to document conditions at rock outcrops as a result of visitor use. A three year multi-agency effort resulted in a series of scientific reports totaling more than 1,000 pages combined. The impacts described for each alternative within Chapter 4 of the ROMP EA/AoE provide a thorough description of the resources at risk, and the impacts of each proposed alternative.

The impact classes defined on pages 16 and 17 of the ROMP EA/AoE do not differentiate between types of human use or impacts. Sites are classified by accessibility, and the total level of all human-caused impacts. Old Rag and Little Stonyman were placed in their own individual classes, because of their intense visitor use, ecological resource values, and management complexity.

The management actions articulated in Chapter 2 of the ROMP EA/AoE, including the partial closure of the three rock outcrop areas on Little Stonyman, Old Rag, and Hawksbill, are supported by these analyses. The outcrops to be closed on the western summit of Old Rag support the park's only occurrence of a state rare plant, and an occurrence of the globally rare Central Appalachian Heath Barren plant community. Human use has decimated once similar occurrences of this rare plant community and rare species on the eastern summit of Old Rag, and is starting to negatively impact the plant community and rare plant population on the western summit. The closure of the western summit will allow the area to recover and thrive. The areas to be closed at Little Stonyman and Hawksbill mountain support high quality occurrences of the globally rare and park endemic High Elevation Greenstone Outcrop Barren plant community. This plant community is found nowhere in the world but in Shenandoah National Park, and must be protected from human impacts to prevent further loss. In addition, the Hawksbill north slope is one of only five sites in the world with occurrences of the Central Appalachian Mafic Boulderfield plant community, and endangered wildlife. The convergence of so many rare and sensitive natural resources in such a small area, makes protection from human impacts urgently important.

The rare species and communities present within the areas to be closed can recover from damage as long as the damage is not too severe. Human impacts have caused permanent loss of these plant communities from other locations within Shenandoah National Park. The purpose of the closures is to fulfill the NPS mission by preventing additional degradation and loss of these rare resources.

Management decisions were made based on total impact, not on use. Combined impacts from all user groups has resulted in the need to close these areas to all uses. Climbers are not being singled out by the proposed management actions as the closures apply to all user groups. The text on pages 34 and 35 of the ROMP EA/AoE regarding closures states that the areas will be closed to climbing and all other off-trail uses. Our decision to close certain areas to all uses allows the best protection of the resources.

GA2000 - Impact Analysis: Closures Subject to Periodic Review

Concern ID: 51197

CONCERN STATEMENT: Commenters suggested closures be subject to periodic review to evaluate if areas could be reopened to climbing and other recreational uses.

Representative Quote(s): **Corr. ID:** 76

Organization: Not Specified

Comment ID: 309889 **Organization Type:** Unaffiliated Individual

Representative Quote: The ROMP should also include a plan to reopen areas that have been closed after a period of time. I propose if closure to climbing does not show results in 2 years then the ban on climbing should be lifted. This provides a self checking system to see that appropriate action was taken and will also allow for different actions to be put in motion at that time to possibly resolve the issue. It was also stated that due to the current impact some vegetation may never grow back due to the harsh environmental conditions of rock outcrops, therefore a closure may not be a solution.

Response:

The proposed use restrictions and closures detailed on pages 34 and 35 of the ROMP EA/AoE affect only a portion of a very limited number of mountains in Shenandoah National Park. Many other places are available for recreation. The closures are designed to limit impacts to sensitive rock outcrop areas from human uses. As explained in the EA, the resources at these outcrops cannot tolerate any level of use; thus, the type of human activity causing the impact is irrelevant. Areas are being closed to human use to avoid all further impacts and to allow the areas to recover. This process is expected to be very lengthy; therefore, the closures and restrictions described on pages 34 and 35 are considered permanent. Once recovery is complete, the closures must continue to protect the rare resources from degradation.

GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects

Concern ID: 51198

CONCERN STATEMENT: One commenter disagrees with the impact analysis for Alternative C and believes closing areas to climbing would result in a major adverse impact to climbing activities.

Representative Quote(s): **Corr. ID:** 6

Organization: PATC Mountaineering Section

Comment ID: 305951 **Organization Type:** Unaffiliated Individual

Representative Quote: For an Old Rag rock climber such as myself, Alternative C, through which both summit areas, the PATC Wall (which you refer to incorrectly as the Skyline Wall) and the Reflector Oven areas would be closed, is a MAJOR not MODERATE impact. In addition, Alternative C would close the entire Little Stony Man cliff.

Your document terms these closures as only moderate but by your own definition they are major. You define a major impact as follows "Changes in climbing activities would be readily apparent, severely adverse and have important long-term consequences. Climbers would be aware of the impact and would like express a strong opinion about the changes."

Well, I can assure you that climbers will be aware of such drastic closures for climbing on Old Rag and at Little Stoney Man and that I and others I have talked to have very strong negative opinions about such closures. I think it is clear that Alternative C causes major adverse changes to rock climbing and that it is unacceptable.

Response:

In the context of the park and climbing areas as a whole, there are few areas being closed to climbing (three out of over two thousand known outcrop areas open to public use). The NPS does not believe the overall impact of such closures in the plan is major because we are not prohibiting climbing or removing all climbing opportunities in the park. We acknowledge that some visitors may experience an adverse impact from the proposed restrictions, and understand that this is more disruptive to some climbers than others. However, the NPS does not believe the impacts will be the same to all climbers or be what most visitors experience. Climbing as an activity is being maintained in the park, and there are climbing opportunities in the park that offer an equal experience to the areas closed to climbing.

PI1000 - Public Involvement: Engaging Climbing Community

Concern ID:

51199

CONCERN

STATEMENT:

Commenters expressed dissatisfaction with the Environmental Assessment/Assessment of Effect's public involvement process for a variety of reasons, including a lack of public meetings, not involving the climbing community in the revisions to the 2012 document, especially revisions to the CMG and restrictions to climbing, and asked the park to engage climbing organizations in future decisions.

Representative Quote(s):

Corr. ID: 77

Organization: Potomac Appalachian Trail Club

Comment ID: 309894

Organization Type: Unaffiliated Individual

Representative Quote: I am disappointed by the failure of the Park Service to involve organizations such as PATC-MS and the Access Fund in the process of developing the 2012 EA/AoE and ROMP and formulating the management Alternatives. Most of the EA/AoE ROMP appears to be directed to the effects of climbers and climbing, more than any other user group, and the failure to involve the PATC-MS and Access Fund is a major shortcoming of the EA/AoE ROMP, particularly in formulating the Alternatives.

Corr. ID: 79

Organization: American Alpine Club

Comment ID: 309899

Organization Type: Unaffiliated Individual

Representative Quote: We would also like to raise our concern at the lack of communication with local climbers that has accompanied the release of this plan. When the last version of this document was prepared in 2008, the NPS worked closely with the local climbing community, holding public meetings and seeking comment. However, the release of this current plan was not accompanied by similar

engagement or even notification; consequently, we encourage the NPS to seek far more active involvement with the local climbing community, including re-establishing formal meetings.

Corr. ID: 87

Organization: Mountaineering Section of the Potomac Appalachian Trail Club

Comment ID: 309929

Organization Type: Unaffiliated Individual

Representative Quote: We would like to briefly mention our concern over the lack of communication and involvement with the local climbing community when changes to the 2008 version of the ROMP were being considered. We have always valued our relationship with SNP and our involvement during the development of the earlier draft. While we appreciate the park's willingness to grant a 30 day extension for public comment due to the lack of notification, given that most changes to the ROMP were that of the Climbing Management Guidelines (Appendix D), there would have been value in continuing the climbing community's involvement. This, we believe, would have been more inline with the intent behind the Park's 1998 Backcountry and Wilderness Management Plan. We hope, in the future, SNP and the local climbing community will have a more open dialogue and be work together on any relevant changes in policy.

Response:

The planning process for this document began in 2005. The NPS hosted on-site field meetings, and had written correspondence with many user groups to include local, regional and national climbing organizations through 2008. The first full public review process for the 2008 EA/AoE included public meetings and extensive public outreach. The process languished until 2012. The 2012 EA/AoE document changed in format and called out a specific Climbing Management Guideline, but the proposed management actions, closures, and impacts in the ROMP did not change between the 2008 and 2012 documents. Because of public concerns expressed during the 2012 EA/AoE public review period, the park extended the public review period to allow additional time to provide feedback. Changes between the 2008 and 2012 documents occurred to simplify the information presented, and were not substantial enough to warrant extensive public outreach beyond the extended 62-day review period.

PN2000 - Purpose And Need: Park Purpose And Significance

Concern ID:

51200

CONCERN

STATEMENT:

Commenters stated the mission of the National Park Service is to provide recreational opportunities and closing climbing and recreation areas for conservation does not appropriately balance resource protection and recreation.

Representative Quote(s):

Corr. ID: 52

Organization: Not Specified

Comment ID: 307142

Organization Type: Unaffiliated Individual

Representative Quote: I'd like to point out that the mission of the park service is to cater to visitor use, while minimizing damage and human impact in the parks. BOTH are crucial. Making blanket policy on rock outcrop use in Shenandoah is negligent. If policy is to be written, then visitor use needs to be classified and banned accordingly. Do the extra assesments, and write policy that will actually work. If hikers are causing damage, put in closures on trails, and set up a permitting system for climbers and other special use activities. Don't remove yourselves from your mission

Corr. ID: 88

Organization: Retired lawyer

Comment ID: 333074 **Organization Type:** Unaffiliated Individual

Representative Quote: To my knowledge, there have been no scientific studies which show that mountaineering and rock climbing have had an adverse effect on the natural resources on Hawksbill Mountain. To the extent there is evidence of an adverse effect, it must be balanced with the congressionally mandated access to recreation. Banning climbing activity on Hawksbill is clearly unacceptable to a rational balance of climbing recreation with conserving other resources in the park. The NPS Organic Act of 1916 directs the NPS to "...conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Important clarification on interpreting the Organic Act is provided in Section 1.4.3 of the NPS Management Policies 2006, which specifically states that "Congress, recognizing that the enjoyment by future generations of the national parks can be assured only if the superb quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant."

Response:

Shenandoah National Park staff has an obligation and authority to manage park resources according to these policies. The purpose of the ROMP is within our policy, rooted in the park significance, and our plan achieves the appropriate balance between conservation and recreation.

PN3000 - Purpose And Need: Scope Of The Analysis

Concern ID: 51201

CONCERN

STATEMENT:

Some commenters thought the scope of the EA/AoE was too narrow, included only rock outcrops, targeted particular user groups, and suggested the scope should be expanded to include non-rock outcrop areas along the Appalachian Trail, while others thought the scope was too broad and that existing protection plans already in place, such as the Peregrine Falcon and Restoration Plan and NPS Natural Resources Management Policy provide sufficient protection.

Representative Quote(s): **Corr. ID:** 76 **Organization:** Not Specified

Comment ID: 309888 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative B is repetitive to the existing Peregrine Falcon Protection and Restoration plan and the NPS Natural Resources Management policies that provide general direction for the protection of ecological communities. The ROMP plans to "Permanently close the Hawksbill summit northwest facing outcrops to off-trail use and climbing, to protect peregrine falcon habitat and to allow recovery of native vegetation." pg35. This is unofficially stating that the Peregrine Falcon Protection and Restoration plan with its short term rock climbing closures is not sufficient, which I don't believe is the case. Likewise is also stating that the NPS Natural Resources Management policy is insufficient again I don't believe this to be the case.

Corr. ID: 88 **Organization:** Retired lawyer

Comment ID: 309942 **Organization Type:** Unaffiliated Individual

Representative Quote: The ROMP should be balanced with an additional environmental assessment of non-rock outcrop areas along the Appalachian Trail (AT). By singling out the rock outcrops in the ROMP, the NPS has placed sole

focus on a small number of rock outcrops including those used for climbing and on the activity of rock climbing. (50 rock outcrops were inventoried out of 2,105 identified). The NPS ignores all of the other land along the AT which should be equally assessed for environmental impacts. The non-rock outcrop areas along the AT may be as likely to contain rare species and to demonstrate impacts. Those impacts would be solely caused by hikers and day users and not climbers. The ROMP itself recognizes that rock outcrops are a small subset of the park by having had to look at campsites and parking lots in order to assess impacts. The basic premise of the scope of the ROMP is thus flawed in limiting the universe only to rock outcrops. Studies should be made of all land along the AT according to the 1981 Comprehensive Plan for the Appalachian Trail.

Response:

As stated on page 2-6 of the EA/AoE, the purpose of the plan is to protect, restore, and perpetuate rock outcrops and natural resources associated with the rock outcrops while providing a range of recreational opportunities for visitors to experience. The project area was not expanded to include non-rock outcrop areas along the Appalachian Trail because these areas are outside the scope of the document, which is explained on pages 11-24 of the EA/AoE. In addition, the Appalachian Trail, which includes non-rock outcrop areas, is managed through other means including the Appalachian National Scenic Trail's Trail Resource Management Plan and Comprehensive Trail Plan.

The Peregrine Falcon Protection and Restoration Plan was designed only to protect Peregrine Falcon habitat. Habitat for Peregrine Falcon is more specific and defined than habitat at rock outcrops in the EA/AoE. It does not provide adequate protection to the full scope and extent of Rock Outcrop resources. The NPS Management Policies provide overall guidance, however, each park needs to develop more detailed plans with specific directions on how the Management Policies will be implemented within the Park. The ROMP is the vehicle the park is using to implement NPS Management Policies to provide more protection for Rock outcrops.

VU6000 - Visitor Use: Impacts to Outcrops

Concern ID:

51202

CONCERN

STATEMENT:

Climbers stated they are a small percentage of park users, believe impacts to rock outcrops are caused by other recreational groups and request the park keep areas open to climbing as impacts from other activities outweigh the impacts from climbing.

Representative Quote(s):

Corr. ID: 21

Organization: Not Specified

Comment ID: 306079

Organization Type: Unaffiliated Individual

Representative Quote: Rock outcrops compose only 2% (920 acres) of the SHEN's entire 197,438 acres. It is important to emphasize that other activities, such as hiking, camping, and vista enjoyment draw far more people and cause far more impacts than climbers. As stated in the ROMP, Old Rag is visited by an estimated 50,000 people annually, but the number of climber use-days for all of SHEN is estimated at only 500.

Because climbers make up only a small percentage of rock outcrops users, the Park should consider if some climbing access can be allowed (even if other user groups

are restricted or otherwise more directly managed) before restricting access to specific rock outcrops (especially those on the "watch list"). Park planners should consider ways to protect the natural resources without prohibiting access to climbers completely.

Corr. ID: 74

Organization: *Not Specified*

Comment ID: 308842

Organization Type: Unaffiliated Individual

Representative Quote: Given the fact that climbers make up only a small percentage of rock outcrop users, the park should consider the possibility that some climbing access could be allowed, even if other user groups are not. Park planners should consider ways to protect the natural resources without prohibiting access to climbing. Climbers have a rich history in Shenandoah National Park, and this history should be preserved as much as possible.

Response:

The park did not intend to insinuate that climbers are having more impacts to rock outcrops than other user groups. We understand the concerns climbers have expressed about the impacts of other user groups. The purpose of the ROMP is to protect resources. Certain areas have been deemed so badly damaged by visitor use, and are of such high resource value, that the only way to afford the necessary protection is to close them to all visitor uses. Section 1.4.3 of the NPS Management Policies 2006, specifically states that resource conservation takes precedence over recreation: "Congress, recognizing that the enjoyment by future generations of the national parks can be assured only if the superb quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant."

The proposed closures have been recommended because the areas have exceptionally rare natural resources that are very sensitive to human impacts, and can only tolerate extremely limited disturbance. Closing and restricting access to rock outcrops is an action of last resort, and is proposed because there is no other option available to protect natural resources. Although information indicates that climbing is a relatively small part of the visitation impacts occurring at outcrops, climbing is a recreational activity that focuses on some of the most sensitive vegetation areas of outcrops. Climbing will still be an activity offered in many areas of the park, but areas that have sensitive biological resources in need of protection will be closed to all off-trail uses.

Climbing Management guidelines were included in the ROMP as a way to guide our management of this user-group. Existing management plans such as the Park's Backcountry and Wilderness Management Plan neglected to address climbing, and including the information in the ROMP was viewed as a logical and streamlined way to correct this omission.