



MID ATLANTIC CLIMBERS



June 28, 2018

Dear Superintendent Brandyburg,

On behalf of Mid Atlantic Climbers (MAC) nearly 2,000 members and supporters in Maryland, Virginia, West Virginia, Pennsylvania, and Washington, DC, and Access Fund's (AF) 17,000 members nationwide, we wish to express our disappointment in Harpers Ferry National Historical Park's June 2017 Superintendent's Compendium, Section 13 that lists rock climbing access closures and restrictions.

We are greatly concerned about Superintendent Compendium, Section 13 because it 1) was issued without consideration of stakeholder input and without consultation with local and national climbing organizations (see the NPS memorandum of understanding with Access Fund¹), 2) was issued in breach of ongoing discussions between MAC, AF, and NPS staff, 4) is not in alignment with NPS climbing management best practices and allowable climbing-related activities, and 5) is poorly justified because it does not accurately reflect historic use behavior and rescue activities.

Harpers Ferry is highly valued by the local climbing community. Having such a significant resource located in close proximity to a major metropolitan area is important to providing access to the outdoors for an urban region. Mid Atlantic Climbers has worked in partnership with Harpers Ferry since 2014, including planning 3 volunteer events, educating the climbing community about seasonal closures for raptor nesting, and acting as a resource for the park in regard to climbing practices and management. The climbing community has an excellent history of compliance with park regulations and MAC has effectively helped the park with several climbing-related issues.

It is because of our longstanding commitment to working collaboratively with park staff that we were disheartened by the June 2017 Superintendent's Compendium, Section 13 which closes all climbing areas in West Virginia and Virginia. Our discontent is based on the following events:

1. At an April 7, 2017 meeting that included park leadership and representatives of the climbing community (MAC and AF), Ranger Jordan Keiffer first mentioned potential restrictions to climbing access. Park staff were unable to provide any evidence-based reasoning as to why new climbing restrictions were warranted. The climbing community strongly advocated against these restrictions at the meeting because NPS units across the country have developed strategies to effectively manage climbing activities in similar environments without damaging sensitive resources or subjecting visitors or NPS staff to unacceptable risks. The climbing community left that meeting under the impression that the park was planning to develop a climbing management plan through a collaborative initiative. After this meeting, Mid Atlantic Climbers and the Access Fund shared climbing management plans and strategies from other NPS units to help Harpers Ferry develop a draft climbing management plan.
2. In September 2017, Ranger Keiffer shared a draft Harpers Ferry climbing management plan with MAC and AF without telling the climbing community that the climbing closures were already issued through the June 2017 Superintendent's Compendium. Shortly after, MAC and AF submitted comments on the plan to Ranger Keiffer in good faith, because the plan did not include standard language and did not align with NPS climbing management best practices. Ranger Keiffer agreed to continue to improve the climbing management plan but Harpers Ferry staff did not respond to the comments provided on the draft climbing management plan.

¹https://www.accessfund.org/uploads/Access-Fund-NPS_MOU_-2014-2019.pdf

3. Harpers Ferry posted new climbing access restrictions to the Harpers Ferry website in December 2017 without informing anyone from the climbing community. Mid Atlantic Climbers and the AF were never notified of the changes and only found out about the new restrictions in March 2018. In the eight months between the publication of the Superintendent's Compendium and when MAC discovered the new restrictions, MAC had several email correspondences with the park leadership about the development of a climbing management plan and worked closely with the park to plan a trail work event at Maryland Heights on October 24th, 2017.

In addition to the new climbing access closures, there is now a significantly expanded registration process for climbing in the park that is burdensome to visitors and does not improve risk management or resource protection. Both of these changes are not in alignment with other climbing management policies and procedures used widely across the National Park Service - including many park units in the mid-Atlantic region.

The issuance of climbing restrictions without engagement with the climbing community is a violation of the good faith partnership that our organizations have worked to establish with Harpers Ferry and the National Park Service. We are extremely confused why Harpers Ferry would issue severe and unjustified recreation restrictions and then avoid sharing the restrictions with the stakeholder group that the restrictions affect, while at the same time collaborating with stakeholders on a management plan that does not reflect the content of the unpublicized, severe restrictions. Mid Atlantic Climbers and Access Fund requests that Harpers Ferry National Park retract 2017 Superintendent's Compendium, Section 13, and initiate a transparent, collaborative process to determine a management strategy that integrates NPS climbing management best practices that allow new and historic rock climbing activities while protecting park resources, NPS staff and park visitors.

Sincerely,



Chris Irwin
President, Mid Atlantic Climbers



Erik Murdock
Policy Director, Access Fund