



Protect America's Climbing



MID ATLANTIC CLIMBERS

February 8, 2019

Harpers Ferry National Historical Park
PO Box 65
Harpers Ferry, WV 25425

RE: HAFE Rock Climbing Closures

Dear Superintendent Brandyburg,

Mid Atlantic Climbers and the Access Fund appreciate our national parks and public servants. We opposed the government shutdown and understand the importance of appropriate funding levels and land management. Thank you for stewarding our public lands. We hope Harpers Ferry National Historical Park is recovering from the shutdown and that our national park system will not have to endure another shutdown in the future.

As part of the re-opening of our national parks, Mid Atlantic Climbers and the Access Fund ask that you also use this opportunity re-open our climbing areas. Our organizations have met with HAFE staff several times over the past two years to discuss rock climbing in Harpers Ferry National Historical Park and collaborate on an informed Climbing Management Plan.

Unfortunately, our input has been largely ignored and climbing closures have been instituted without reasonable justification, NEPA analysis, or opportunities for public comment. We ask that the closures of climbing in the WV and VA portions of the park be lifted and that the temporary closure to climbing on Maryland Heights due to the landslide and construction vehicle traffic on Sandy Hook road also be lifted. We believe that there is not sufficient evidence to warrant these closures and ask that you lift the closures in next Superintendent's Compendium.

Rock Climbing Access Issues

Ryan Levins provided Mid Atlantic Climbers with five concerns regarding rock climbing access to the WV and VA portions of the park. Please consider our responses to each of the park's concerns:

1. The rock type is of a poorer quality than on the Maryland side, and received fewer climbers because of this. Also, the rocks in Virginia along 340 face north and receive significantly less sunlight than the South facing MD Heights, so the rocks don't get climbed often in the Fall, Winter and Spring months.

MAC response: The rock in VA and WV is not poorer in quality, there have been no studies that we are aware of to suggest this and climbers have a long history of enjoying the rock at Harpers Ferry in MD, VA and WV. Low use levels should not be a reason to close access. It is important to allow the entire spectrum of climbing opportunities and experiences - including ones that provide greater solitude. Climbers need rock that faces all aspects and many climbers prefer to climb in colder conditions because of increased friction. This assertion sets a bad precedent and NPS should not be projecting unsubstantiated recreation values on the

climbing community. The climbing community wants these cliffs and boulders open because we appreciate the rock and the experience at these climbing resources.

2. Access is an issue. The Virginia cliffs along 340 have very few access points as climbers would have to walk along the highway to access many of the cliffs.

MAC response: There are access points, parking pullouts and a shoulder that climbers can use. We can work with the park to identify the safest parking/approach and share this information with the park. This is an entirely solvable issue. One site visit with the park could identify the best and safest access points. In addition, climbers have never had any safety issues or rescues while climbing at these locations. Why restrict access when there is not a documented problem or past experiences that warrant a closure? In other words, climbers have a great track record at these sites.

3. Parking is an issue as well. There's very few spots for people to park except our River Access lot and then after climbers cross the Shenandoah Bridge that encourages people to walk along 340. The parking at the lot by the Tri State Exxon is not ours and the trails are off park property and those aren't park approved trails.

MAC response: Once again, there are many legal parking spots in the park and climbers may use those just like any other visitor to the park. There are many climbing areas throughout America's NPS system that are accessed from roads. However, there are essentially no examples of closures to the more than 3000 NPS climbing areas (discrete cliffs) in over 80 parks for this reason. Climbers can follow the same rules as other park users for parking and access.

4. The park closed climbing in WV because most of the climbing routes are near Lower Town. Some of this climbing use in the past had led to park visitors trying their hand and try to take part in climbing activities. This led to kids and inexperienced visitors climbing on the LT cliffs. Now if there are other areas in the park in WV away from the Lower Town then I'd certainly be willing to talk about those.

MAC response: There are well over 80 national parks with over 3000 documented climbing areas. NPS recreation managers across the country do not close climbing because other visitors see climbers. Nearby parks, such as Great Falls, attract thousands of visitors who see climbers on cliffs. There is no evidence that seeing climbers leads others to attempt dangerous activities. If this is happening at Lower Town cliffs, simple education through signage would be an effective way to mitigate that issue. This is entirely solvable and not in alignment with the way NPS manages climbing activities across the country. We feel that with proper education and management having climbing in Lower Town could be a benefit to the park and the community. At one of our meetings we discussed how the relative ease of access and low angle of the cliff would make this cliff ideal for introductory classes or adaptive programs (i.e. Boy Scouts, Wounded Warriors, or special needs populations).

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Mid Atlantic Climbers and Access Fund believe that visitor use closures should be determined by the NEPA process that involves scientific inquiry and opportunities for public input. The NEPA process is designed to avoid unsubstantiated closures and to include the public in

decision making that affects the environment and visitor flow on federal lands. Without the NEPA process, the current climbing closures are ill-informed, unsubstantiated, and contrary to federal law.

We ask you to lift the climbing access closures and work with the climbing community on the development of a Climbing Management Plan. To this end, we plan to discuss this issue with national-level NPS administrators and to launch a letter writing campaign asking climbers to write to Harpers Ferry National Historical Park in support of removing these restrictions and developing well-reasoned climbing management strategies.

Mid Atlantic Climbers and Access Fund stand ready to assist HAFE with climbing management and stewardship and look forward to a future of mutually beneficial collaboration. Thanks in advance for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Chris Irwin". The signature is stylized and written in a cursive-like font.

Chris Irwin, Mid Atlantic Climbers President

A handwritten signature in black ink that reads "Erik Murdock". The signature is written in a cursive-like font.

Erik Murdock, Access Fund Policy Director

CC: Ryan Levins, Harpers Ferry National Historical Park Chief of Law Enforcement
Andrew Lee, Harpers Ferry National Historical Park Resource Management Specialist
Mia Parsons, Harpers Ferry National Historical Park Chief of Integrated Resource
Management