



MID ATLANTIC CLIMBERS

December 16, 2014

Catoctin Mountain Park
6602 Foxville Road
Thurmont, MD 21788

RE: Access Fund and Mid Atlantic Climbers comments on 2015 Superintendent's Compendium

Dear Superintendent Poole,

The Access Fund and Mid Atlantic Climbers welcome the opportunity to comment on the *2015 Superintendent's Compendium* for Catoctin Mountain Park. We look forward to working with the National Park Service to preserve climbing opportunities and conserve the climbing environment at Catoctin Mountain Park.

The Access Fund

The [Access Fund](#) is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest climbing advocacy and conservation organization with over 10,000 members and 80 affiliates. The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; and works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States.

Mid Atlantic Climbers

An Access Fund affiliate, [Mid Atlantic Climbers](#) (MAC) is a 501c3 non-profit organization dedicated to preserving access to climbing areas in the Mid-Atlantic region, while promoting responsible climbing and environmental stewardship. MAC has over 700 members, volunteers, and supporters and serves as a liaison between the climbing community and land managers (park or private) for the climbing areas in our region. For over 10 years MAC has worked with federal land managers in the region to preserve climbing resources and the natural environment, including at Great Falls Park, Chesapeake & Ohio Canal National Historical Park, Shenandoah National Park, and Harpers Ferry National Historical Park.

COMMENTS

The Access Fund and Mid Atlantic Climbers applaud Catoctin Mountain Park for its yearly effort to solicit public feedback on the Superintendent's Compendium. Management planning

should acknowledge the various potential recreation resources and users, and provide for the preservation of outdoor experiences to the greatest extent possible consistent with resource protection objectives. The Access Fund and Mid Atlantic Climbers are concerned with the preservation of climbing opportunities, and we have reviewed the 2015 Superintendent's Compendium to assess the management plan's effect on climbing and the climbing environment only.

The Access Fund and Mid Atlantic Climbers are concerned that the 2015 Superintendent's Compendium does not offer a full range of climbing opportunities that would support the park's mission to provide recreational experiences while preserving the park's natural and historical resources.

Specifically, Section 1.5 prohibits rock climbing in all areas of the park except for Wolf Rock, where the area capacity is limited to 20 participants. Helmets and permits are required. Bouldering is included in the definition of rock climbing; therefore helmets and permits are required for bouldering and this activity is prohibited in all areas of the park except for Wolf Rock. Prior to the 2012, these restrictions on bouldering at Catoctin Mountain Park were not present in the Superintendent's Compendium.

The Access Fund and Mid Atlantic climbers are concerned that these restrictions unnecessarily limit outdoor recreation opportunities..

Potential Climbing Resources

Wolf Rock offers top rope climbing ranging from grades 5.0 to 5.3, and is an area well-suited to beginning climbers and those who wish to practice their rappelling skills.

Apart from Wolf Rock, a number of other areas that have historically been climbed are present at Catoctin Mountain Park. Specific to the sport of bouldering, numerous high quality opportunities can be found along Foxville Road east of the Catoctin Mountain Park Headquarters, and also along the Hog Rock Trail west of the Visitor Center. We believe that the park should evaluate these areas for possible inclusion as open climbing resources.

Bouldering Restrictions

The Access Fund and Mid Atlantic Climbers urge Catoctin Mountain Park to reconsider the prohibition of bouldering in the park aside from Wolf Rock. While bouldering is a type of rock climbing, it differs from top rope climbing in several aspects. In Catoctin Mountain Park, many boulders are small in comparison to a cliff line like Wolf Rock, and therefore the average hiker can often walk up one side of the boulder without actually "climbing" the rock. The Access Fund and Mid Atlantic Climbers believe bouldering should be allowed in areas and upon rocks accessible to other outdoor recreationists.

The sport of bouldering generally does not involve the use of helmets. Boulders use "crash pads" and spotters for safety, as the large majority of bouldering routes are not high enough off

the ground to necessitate additional equipment. The Access Fund and Mid Atlantic Climbers urge Catoctin Park to also reconsider the helmet requirement for bouldering within the park.

In addition, we are unclear on when climbing is allowed in the park. The website notes that climbing is allowed between 10:00am and 4:30pm on weekdays and 8:30am and 5:00pm on weekends. In contrast, the Superintendent's Compendium allows for climbing during daylight hours, which would fall outside of these time periods.

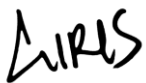
Access Fund and Mid Atlantic Climbers Assistance

While the Superintendent's Compendium does not describe the exact reasoning behind these bouldering restrictions, it is the Access Fund's and Mid Atlantic Climbers' experience that virtually all threats or impacts to natural resources associated with bouldering can be reduced through a combination of education, cooperation with the climbing community, and site-specific prescriptions.

The climbing community, the Access Fund, and Mid Atlantic Climbers stand ready to help park staff assess climbing area conservation needs, work with staff to address these needs through volunteer events and climber education, and continue the conversation about the future of climbing and bouldering within Catoctin Mountain Park.

Thank you for your consideration of our comments in regards to bouldering at Catoctin Mountain Park. We look forward to working with you in the future to maintain climbing and bouldering access and to conserve the natural environment at Catoctin Mountain Park. Feel free to contact Jackie Feinberg, jackieomdb@gmail.com at Mid Atlantic Climbers or Erik Murdock, erik@accessfund.org at Access Fund to discuss this important issue.

Sincerely,



Chris Irwin, President, Mid Atlantic Climbers



Erik Murdock, Policy Director, Access Fund

cc: Edwin Bachetti, Vice President, Mid Atlantic Climbers