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Dear Dan,

Thank you for giving us the opportunity to respond to the Draft of the Taylor Pond Unit Management Plan (UMP). A number of climbers who are very familiar with the area, including myself, have consolidated our comments. We believe these to be representative of the broader climbing community.

In the first section (Part I), we address the broad issue of the Moratorium/Inventory/Focus Group proposed as management actions on page 109. We appreciate that the UMP is in an advanced stage and that comprehensive change in this area may not be possible. Therefore, on this topic, we have provided comments, but haven't made specific suggestions on text changes to the UMP.

In the second section (Part II), we make a number of recommendations for changing the text in the UMP. We've organized these by 1) sighting a page number, 2) repeating the text from the UMP, 3) listing our comments, then 4) providing amendments to the UMP's text (inserted text is underlined-green, and deleted text is ~~strikethrough-red~~).

We are moved to propose edits because we believe there is bias in the UMP unfavorable to climbing, which comes from outdated information that was used directly as a source. We take issue with the obsolete material because we feel climbing is a legitimate recreational activity. We would like to see it recognized as such and treated in alignment with other activities, such as hiking. We hope this outmoded text can be easily updated to help correct bias. Further, certain actions specified in this UMP create a safety hazard for climbers.

The climbing community believes in collaboration with land managers. Recently we have demonstrated effective collaboration with the DEC with regards to trail maintenance and the peregrine falcon monitoring program. Additionally, the Access Fund, a national organization which actively supports and promotes this type of collaborative endeavor, is available as a resource to both of us. They bring broad knowledge from other areas, and often help reduce the length of policy development from many years to just a few months.

We, as climbers, are ready and willing to help in any way we can. Thank you for your consideration and for taking time to read this.

Regards,

Jim Lawyer
Jeremy Haas
Tom DuBois
Aya Alt
Jesse Williams
Colin Loher
Chris Duca
Mark Meschinelli
Justin Sanford
Royce Van Evera
Tad Welch
Neal Knitel

Page I: The Moratorium of Fixed Anchors

The UMP schedule calls for a moratorium on new and replacement fixed anchors (to happen when the plan goes into effect), an inventory (to happen in year 3), then a focus group (to happen in year 4). We support proposals in the draft that add value—improving trails, reducing erosion, installing privies in high-use areas. The policy on fixed anchors, however, concerns us.

Most importantly, as we explain in this section, we feel the moratorium on replacing existing fixed anchors creates a significant safety issue. This may be easily addressed by removing four words from the UMP.

Hiking and Climbing Should be Considered Together

Hiking has been a known activity for a very long time, but rock and ice climbing have been relatively unknown to land managers and policy developers. As a result, there is acceptance of hiking so the associated trails, markers and signs have been built into the UMP language. Clearly, these "permanent installations" have a huge visual impact—trails have a visibly-obvious footbed; maintenance is noticeable in terms of cut logs, removed branches, water bars; signs and markers are actually intended to be visible; and most people agree that these are important safety features that would be unwise to remove.

Climbing was unknown to early policy writers, so "permanent installations" related to climbing were simply left out of the UMP. We would like to see climbing treated as a legitimate recreational use of the land the same as hiking, instead of being left out only because it was not known to the original policy writers.

A climbing route is analogous to a hiking trail—but far less visible, and results in almost no wear or erosion because, by its nature, it is restricted to hard rock surfaces. Similarly, the permanent installations of climbing (e.g., bolts, pitons, webbing) should be considered side-by-side with the permanent installations of hiking (signs and markers). It's an incontestable fact that climbing installations are far less visible than hiking installations, because there are fewer of them, and, importantly, because they are not intended to be conspicuous. All hiking trails are expected to have signs and markers, but only a small percentage of climbing routes have bolts, and the bolts are tiny.

Support for this lack of visual impact can be found in the recently completed fixed anchor inventory at Pitchoff and Beer Walls: The group performing the inventory was unable to locate the bolts without using the climbing guidebook, demonstrating that the current use of fixed anchors by the climbing community is purposefully low impact, and that there is essentially zero visual effect from their use.

Fixed Anchor Maintenance

The UMP proposes to ban replacement of existing fixed anchors. The reliability and maintenance of climbing anchors is a much more immediate safety concern than is the condition of trail signs and markers. Both are safety issues, but a lost hiker has time, and several options to correct their situation, whereas a climber who uses a failing bolt, or finds a bolt missing, may be in immediate danger.

The moratorium on fixed anchor replacement is not necessary, and is actually dangerous to recreational climbers; it is likely to create costly emergency situations. Just like signs and markers, fixed anchors do not last forever. Nationwide, climbers responsibly replace fixed anchors which are no longer in good condition. An example of this is the Anchor Replacement Initiative program (<http://www.climbing.com/ari/>), which is welcomed by land managers nationwide in collaboration with their local climbing communities.

Preventing climbers from correcting unsafe fixed anchors, while allowing climbing, creates liability for the DEC.

We suggest that this important safety issue be addressed now by removing four words from the Management Actions section on page 109.

Moratorium of New Fixed Anchors

The UMP proposes to ban all new fixed anchors. This is not necessary because, as established above, the climbing community has been responsible in the use of these installations such that they have little visual impact. And particular to the Taylor Pond unit, the addition of new routes (and new fixed anchors that sometimes accompanies new routes) has long since halted. The climbing community agrees that no fixed hardware is to be added to existing routes, and because of this practice, no new hardware has been added to Poke-O for years.

Even though we object to the moratorium on new fixed anchors, we make no suggestions on changing the text of the UMP due to the timing of this letter.

Fixed Anchor Inventory

The UMP proposes to inventory all existing fixed climbing anchors. We believe the inventory isn't a useful endeavor as it consumes weeks of time, and will only result in a number that may seem alarming to land managers. As an extreme example, suppose a land manager that's never heard of "hiking" was told the number of markers for trails up Marcy. An inventory is very difficult and will never be accurate, as even climbers have trouble locating fixed hardware.

Even though we object to the inventory of fixed anchors, we make no suggestions on changing the text of the UMP due to the timing of this letter.

Moratorium Schedule

The UMP proposes to wait four years before starting work to develop a policy regarding fixed anchors. This is not necessary because many excellent examples of policies already exist across the country. All the different policy aspects, including visual impact, land management approvals of new bolts, and safe replacement of existing bolts as required, have all been studied, debated and agreed upon years ago in many wild land areas. These policies are publicly available. The Access Fund (<http://www.accessfund.org>) is generally eager to help with policy development and offers examples of successful implementation.

Discussion on these issues appears on page 109 (under Management Actions), page 228 (in the timetable for year 3), and page 229 (the timetable for year 4).

We make no suggestions on changing the schedule in the UMP. We do wish to register our concern that, despite having successful fixed anchor policies available from other sources, the schedule set forth in the plan will be ignored, much like the schedule presented long ago in the Giant/Dix UMPs. For those UMPs, the inventory and focus group deadlines were never met, so in practical terms, the "temporary moratorium" has essentially been permanent.

Part II: Suggested Changes to the UMP

Page ii, last paragraph

Poke - O - Moonshine Climbing and Poke - O - Moonshine hiking trail to tower - Poke - O - Moonshine consists of three separate management areas, two Wild Forest sections and an Intensive Use Area. The Intensive Use Area will be referred to as the public campground. The two Wild Forest sections will be referred to as the climbing area and hiking or fire tower area. This climbing area makes up the balance of the climbing that is not included in the intensive use area and outlined in the Climbing in the Adirondacks Guide Book (Mellor, D. 1995). The Intensive Use Area will not be discussed in detail since it has a current UMP that was adopted in 1995. The boundary of the Intensive Use Area and Wild Forest is not clearly defined. The Intensive Use Area is 3 acres of developed land with 272 acres remaining undeveloped. The 272 acres partially encompass the rock cliffs known as Poke - O - Moonshine climbing area. The Intensive Use Area and Wild Forest boundary lines meet in the center of the climbing area known as the left central main face. This section comprises most of the climbing. Legal parking and access to the climbing and hiking...

Throughout the UMP, reference is made to Mellor's guidebook, *Climbing in the Adirondacks*. This reference is now 17 years old and is now obsolete and out of print. Updated references include *Blue Lines* (Mellor, D. 2005) for ice climbing, and *Adirondack Rock* (Lawyer, J. and Haas, J. 2008). Not only are these references more up-to-date with respect to the cliff descriptions and rock/ice climbing routes at Poke-O Moonshine, they also contain the latest information on climbing-related issues with peregrine falcons (written by the endangered species unit). The endangered species unit of the DEC also describes cliff closures using route numbers and photos from *Adirondack Rock*. Finally, note that *Adirondack Rock* contains information on rock climbing at Catamount Mountain, which I believe is included in the region covered by the UMP.

The statement about where the boundary line between the Intensive Use Area and Wild Forest could better be described in relation to named cliff sections of *Adirondack Rock*. Since the border isn't known, describing the "left central main face" as the section containing most of the climbing routes isn't quite accurate. There are 285 routes on Poke-O Moonshine (described in *Adirondack Rock*), and the left section of the Main Wall near the campground has perhaps a mere 50 routes.

This paragraph could be rewritten as follows:

Poke - O - Moonshine Climbing and Poke - O - Moonshine hiking trail to tower - Poke - O - Moonshine consists of three separate management areas, two Wild Forest sections and an Intensive Use Area. The Intensive Use Area will be referred to as the public campground. The two Wild Forest sections will be referred to as the climbing area and hiking or

fire tower area. This climbing area makes up the balance of the climbing that is not included in the intensive use area and outlined in the [Climbing in the Adirondacks Guide Book \(Mellor, D. 1995\)](#), [Adirondack Rock \(Lawyer, J. and Haas, J. 2008\)](#) and [Blue Lines \(Mellor, D. 2005\)](#). The Intensive Use Area will not be discussed in detail since it has a current UMP that was adopted in 1995. The boundary of the Intensive Use Area and Wild Forest is not clearly defined. The Intensive Use Area is 3 acres of developed land with 272 acres remaining undeveloped. The 272 acres partially encompass the rock cliffs known as Poke - O - Moonshine climbing area. The Intensive Use Area and Wild Forest boundary lines meet in the center of the climbing area known as ~~the left-central main face. This section comprises most of the climbing~~ [Main Face](#). [The Main Face comprises roughly 167 of the 285 known rock climbs at Poke-O Moonshine, and a good portion of the popular ice climbs.](#) Legal parking and access to the climbing and hiking...

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Peregrine Falcons and Rock Climbers

Human disturbances, such as rock climbing on cliffs containing eyries, can be a potential problem to nesting Peregrines. Human disturbance within the territory of a breeding pair may result in nest abandonment and/or death of any young. Rock climbing routes with known peregrine falcon nesting sites are monitored by NYSDEC annually. Rock climbing routes with active nest sites are temporarily closed to prevent any disturbances that might interfere with the successful raising of the young peregrine falcons. The closure of climbing routes is based on a number of factors, including the route's proximity to a nesting site, observations of alarm behavior by the nesting falcons, and professional judgement by NYSDEC staff. The specific areas of the cliff that are closed to rock climbing represent a balance between the recreational interests of climbers and the need to protect the breeding and nesting activities of this endangered species. The department's priority is protecting an endangered species; however, attempts are made to maximize the opportunities for climbing at the same time. This is the reason why individual rock climbing routes are closed rather than entire cliffs.

In summary, NYSDEC stresses the following points to Adirondack rock climbers:

- Peregrine Falcons are an endangered species and are protected under state and federal law,
- Human disturbance within the territory of a breeding pair may result in nest abandonment and/or death of any young,
- Certain rock climbing routes are closed and illegal to climb during the breeding season, and
- Falcons are very territorial and will utilize their razor sharp talons in defense of their domain, including attacks on humans.

For many years now, the climbing community has worked collaboratively with the DEC, helping the wildlife resources to locate and study peregrine falcon nest locations around the High Peaks, and especially at Poke-O Moonshine. This has been beneficial to the climbing community, to the DEC, and to the falcons. The UMP should take advantage of this excellent collaboration, and codify this as an ongoing program.

Joe Racette wrote the peregrine section in *Adirondack Rock*, further evidence of this collaboration.

In addition to the statements "stressed" to climbers, we suggest adding a paragraph to the above:

[For many years now, the rock climbing community has worked collaboratively with the DEC to help locate, study, and monitor peregrine nest sites, both on cliffs monitored by the DEC and cliffs out of practical reach of the DEC. This collaboration has been beneficial to the climbing community, the DEC, and to the falcons.](#)

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Poke - O - Moonshine Rock and Ice Climbing - This well known area attracts climbers from all over the northeast. The area has a detailed guide book and many bolted routes. Bolted routes are climbing routes that have fixed anchors that have been drilled into the rock to serve as repelling points and belay points for climbers to use when climbing the route. The routes attract climbers of all abilities and ages. A detailed monthly accounting of use numbers derived from the trail register data is included in Appendix D. As well as rock climbing routes, the walls also provide for ice climbing routes in the winter months. Access to this area is provided through the Department's Public Campground which was closed in 2009. During the spring, summer and fall the gate is left open to the campground to facilitate public access. There is no official winter parking for this area. Climbers and other winter users park along the road.

Poke-O has very few purely bolted routes, or what is commonly referred to as "sport climbs". (A sport climb is one fully protected by permanent anchors, adequately spaced so as minimize risk to the climber.) Saying that there are "many" is an overstatement. There are indeed some routes that have occasional bolts, but most routes require a full assortment of removable climbing gear (nuts, cams, and so forth).

The paragraph implies that bolted routes are more accessible to all abilities and ages. This may be true, but since Poke-O has very few such routes, this statement doesn't apply. Poke-O is a non-beginner climbing area for experienced "trad" climbers—i.e., those with skills placing removable protection. (For obvious reasons, perhaps the UMP should avoid use of the sport-specific terms "trad" and "sport".)

There is no register that climbers sign at Poke-O. The only register is at the trailhead for the summit hiking trail; the approach to the cliff is several hundred yards away on the other end of the campground (there is a signpost here that the DEC uses for cliff closures). Hence, any accounting from the trail register in Appendix D will not apply to rock climbers. Perhaps this statement should be moved elsewhere in the UMP where hiking is discussed?

We suggest changing the paragraph as follows:

Poke - O - Moonshine Rock and Ice Climbing - This well known area attracts climbers from all over the northeast. The area has a detailed guide book and hundreds of routes, a few of which employ the use of bolts (fixed anchors drilled into the rock) where no other safe protection options exist ~~many bolted routes. Bolted routes are climbing routes that have fixed anchors that have been drilled into the rock to serve as repelling points and belay points for climbers to use when climbing the route.~~ The routes attract mostly experienced climbers of all abilities and ages. ~~A detailed monthly accounting of use numbers derived from the trail register data is included in Appendix D.~~ As well as rock climbing routes, the walls also provide for ice climbing routes in the winter months. Access to this area is provided through the Department's Public Campground which was closed in 2009. During the spring, summer and fall the gate is left open to the campground to facilitate public access. There is no official winter parking for this area. Climbers and other winter users park along the road.

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- Access trails to rock climbing areas will be identified and classified as Class III trails. All trails will be maintained, relocated, or reconstructed to specified standards, as identified in the trails classification and standards system.
- Maintain the Poke - O - Moonshine Climbing Trail.

There are many mentions of trails used by climbers, or trails used to access rock climbing. We don't see any concerns regarding the DEC improving, maintaining, or even marking these, especially those to the Main Face and the Poke-O Slab. We do believe that maintaining trails to the Upper Tier cliffs is a waste of resources since it is a seldom-visited, wild cliff area.

We believe that climbers should be involved if these trails are relocated to ensure they still provide the required access. In fact, it is possible that climbers can be engaged to perform the work under an AANR agreement.

We suggest the following change:

- Access trails to rock climbing areas will be identified and classified as Class III trails. All trails will be maintained, relocated, or reconstructed to specified standards, as identified in the trails classification and standards system.
- Maintain the Poke - O - Moonshine Climbing Trail.
- All climbing access trails will be maintained in collaboration with the Adirondack Climbing Coalition.

Page 108-109

I. Rock and Ice Climbing

Present Conditions:

The Adirondack region remains one of few areas in the country where the placement of fixed climbing anchors (bolts) is not common - place. The reputation of the region is one of traditional climbing, one where bolts and pitons are the exception rather than the rule. The use of fixed anchors, particularly fixed expansion bolts, placed in holes drilled into the rock has been an issue of controversy in public land management (Access Fund, 2001). Fixed anchors have long been used by climbers as a method of protection where use of traditional removable protection (camming devices, chocks and nuts) is not possible. Fixed anchors, including bolts and slings placed around trees, have also been used for rappel anchors. This practice can provide some level of protection to the natural resource by reducing damage to trees by girdling, caused when rappel ropes wrapped around trees are pulled down at the end of a climbing session. When placed indiscriminately, bolts and related fixed anchors can mar cliff faces and result in visual impacts. The use of fixed anchors as a resource protection tool, when properly managed can be an important management tool. Use of fixed anchors for protection on a climb that might not be possible without the placement of fixed or artificial anchors has engendered controversy both within and outside the climbing community. The use of fixed anchors for this purpose in some areas has fundamentally altered the sport of climbing, resulting in a "climbing gym" atmosphere where numerous bolts are used to create a route where none previously existed. The appropriateness of this use of fixed anchors is considered to some as contrary to wild forest philosophy.

At this point in time the placement of bolts, or other fixed anchors which involve drilling or defacement of the rock is a violation of Department regulations (6 NYCRR 190.8(g) - - "No person shall deface, remove, destroy, or otherwise injure in any manner whatsoever any . . . rock, fossil or mineral . . . excepting under permit from the Commissioner of Environmental Conservation and the Assistant Commissioner for State Museum and State Science Service . . .").

Large rock and ice climbing groups have the potential to become a management issue at Poke - O Moonshine. Large groups cause a disproportionate amount of physical impact to a site and have a large social impact on other users. The nature of the climbing itself, concentrates use on a very small area. Individuals who are not climbing congregate at the base of the climbs, causing loss of vegetation and erosion. Soil erosion, compaction and vegetative loss at the base of climbs is significant and shows heavy use. This congregating effect also impacts other climbing parties since multiple climbing routes begin in close proximity to one another and open space at the base of the climbs is already quite limited. The Department will continue to monitor Poke - O - Moonshine for the development of social and other user conflicts. If these conflicts present themselves it may be necessary in the future for regulations to be promulgated.

In addition to the use issues at Poke - O - Moonshine an additional conflict with rock climbers presents itself during the spring and summer. The rock face that hosts many of the climbing routes is also a nesting location for Peregrine Falcons. These birds choose a variety of locations and require the closure of most of the climbing during nest choosing periods of the spring and early summer. As the birds choose nesting sites the climbing routes that do not interfere with the birds are reopened.

Objectives:

- *Manage visitor use to keep impacts on the resource and experiences of all visitors at an acceptable level consistent with the concept of a Wild Forest.*
- *Provide fair and equitable access to rock and ice climbing resources.*
- *Manage rock climbing sites to minimize environmental impacts.*
- *Keep the effects of visitor use on resources to a minimum.*
- *Minimize conflicts between climbers and wildlife.*

Management Actions:

- *Stabilize soil at the top and base of climbing routes where erosion is identified as a problem.*
- *Close climbing routes when necessary to facilitate Peregrine Falcon nesting.*
- *A temporary moratorium will be established relative to the establishment of new, or replacement of existing, bolts or fixed pitons. The Department will undertake an inventory of all existing fixed anchors in the Unit. The Department will convene a focus group, including Department and APA staff, members of the climbing community, environmental organizations and other interested parties to develop a policy on the management of fixed anchors on Forest Preserve lands.*
- *Classify trails to climbing routes as Class III trails.*

We understand that most of this text is borrowed from the Giant/Dix UMPs.

The third paragraph is new to this UMP (not included in the Giant/Dix UMP). The wording is aggressive against climbers, specifically the wording "...an additional conflict with rock climbers presents itself..." We suggest changing the paragraph.

The first paragraph describes realities that do not apply to cliffs in this unit. There is no conflict within the climbing community regarding the use of bolts used for protection at these cliffs. It also describes indiscriminate use of bolts—the historic placement of fixed protection has not been indiscriminate, and there has been no bolting at Poke-O for many years now, so this language is outdated and overly alarmist. There is mention of a "climbing gym atmosphere". Indeed, the Giant and Dix UMPs have an additional statement that this [climbing gym atmosphere] has yet to happen in that region; somehow, this statement was removed from this UMP. Poke-O is not a sport-climbing cliff, nor does it have a gym-like atmosphere; describing it as such exaggerates the level of impact. We believe this educational information that applies only to other areas in the country should either be removed, or additional statements added to describe how this unit's cliffs are different.

As discussed in the first section, the UMP calls for a moratorium on replacement of fixed anchors. This is inappropriate, and actually dangerous to recreational climbers.

Regarding the ban on "fixed pitons", rock climbers no longer place pitons. There are historic in-place pitons which, in some cases, absolutely need to be replaced from time to time to avoid dangerous situations. Ice climbers occasionally place fixed pitons, but this is rare, and they are generally removed by the climbing party. Outside of maintaining pitons for safety, we don't believe it's necessary to even mention fixed pitons.

We were unable to locate mention of a pit-privy on the site of the Poke-O Moonshine campground. During the summer of 2012, there were porta-potties (perhaps still there?). There is an urgent need for such facilities at this location, as the trailhead is shared by hikers and climbers. The Dix UMP includes a

provision for a pit-privy at the Beer Walls (a location of clear, urgent need). Unless this is covered in another UMP for the intensive use area, we propose adding it here (by copying the text from the Dix UMP).

Here is the amended section:

I. Rock and Ice Climbing

Present Conditions:

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The rock climbing areas in this unit do not have a "climbing gym" atmosphere, and fixed anchors have not been placed indiscriminately as has been the case in other areas of the country. In fact, placement of fixed anchors has all but ceased at the cliffs in this unit, maintaining their wild, natural feel.

At this point in time the placement of bolts, or other fixed anchors which involve drilling or defacement of the rock is a violation of Department regulations (6 NYCRR 190.8(g) - - "No person shall deface, remove, destroy, or otherwise injure in any manner whatsoever any . . . rock, fossil or mineral . . . excepting under permit from the Commissioner of Environmental Conservation and the Assistant Commissioner for State Museum and State Science Service . . .").

Large rock and ice climbing groups have the potential to become a management issue at Poke - O Moonshine. Large groups cause a disproportionate amount of physical impact to a site and have a large social impact on other users. The nature of the climbing itself, concentrates use on a very small area. Individuals who are not climbing congregate at the base of the climbs, causing loss of vegetation and erosion. Soil erosion, compaction and vegetative loss at the base of climbs is significant and shows heavy use. This congregating effect also impacts other climbing parties since multiple climbing routes begin in close proximity to one another and open space at the base of the climbs is already quite limited. The Department will continue to monitor Poke - O - Moonshine for the development of social and other user conflicts. If these conflicts present themselves it may be necessary in the future for regulations to be promulgated.

~~In addition to the use issues at Poke - O - Moonshine an additional conflict with rock climbers presents itself~~ During the spring and summer, ~~the Main Face~~ ~~The rock face~~ that hosts many of the climbing routes is also a nesting location for Peregrine Falcons. These birds choose a variety of locations and require the closure of most of the climbing during nest choosing periods of the spring and early summer. As the birds choose nesting sites the climbing routes that do not interfere with the birds are reopened.

Objectives:

- Manage visitor use to keep impacts on the resource and experiences of all visitors at an acceptable level consistent with the concept of a Wild Forest.
- Provide fair and equitable access to rock and ice climbing resources.
- Manage rock climbing sites to minimize environmental impacts.
- Keep the effects of visitor use on resources to a minimum.
- Minimize conflicts between climbers and wildlife.

Management Actions:

- Stabilize soil at the top and base of climbing routes where erosion is identified as a problem.
- Close climbing routes when necessary to facilitate Peregrine Falcon nesting. Continue working closely with the Adirondack Climbing Coalition to identify and monitor peregrine nest sites.
- A temporary moratorium will be established relative to the establishment of new ~~-or replacement of existing-~~ bolts ~~or fixed pitons~~. The Department will undertake an inventory of all existing fixed anchors in the Unit. The Department will convene a focus group, including Department and APA staff, members of the climbing community, environmental organizations and other interested parties to develop a policy on the management of fixed anchors on Forest Preserve lands.

- *Classify trails to climbing routes as Class III trails.*

- *Establish a pit-privy (or related facility) at the Poke-O Campground.*

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Reference is made to Mellor's 1993 guidebook. As noted earlier, this reference should be updated to *Adirondack Rock and Blue Lines*.