



July 26, 2021

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Submitted via email: comments-southern-daniel-boone-cumberland@fs.fed.us and
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**RE: DRAFT Comprehensive River Management Plan (CRMP) for the Red Wild and Scenic River;
and the Red River Gorge Management Planning Project Preliminary Environmental Analysis
(EA) and Finding of No Significant Impact (FONSI)**

The Access Fund and Red River Gorge Climbers Coalition (RRGCC) appreciate this opportunity to provide comments on the CRMP and Red River Gorge Management Planning Project EA and FONSI. We appreciate and applaud the Daniel Boone National Forest's (DBNF) Cumberland Ranger District for evaluating and including climbing in the planning process and drafts.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 130 local affiliate organizations. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund holds a national MOU with the USFS to support cooperation on climbing management. For more information about the Access Fund, visit www.accessfund.org.

Red River Gorge Climbers Coalition

The RRGCC is a 501c(3) nonprofit climbing advocacy and conservation organization and affiliate of the Access Fund whose mission is to secure and protect open, public access to rock climbing in the Red River Gorge area and to promote conservation of the environment on the lands where we climb. The RRGCC and its members also value the world class rock climbing opportunities

found in and around Red River Gorge as a national treasure deserving of our best efforts to preserve for all climbers to enjoy, experience, and appreciate. In addition to owning three recreational preserves with climbing, the RRGCC works with the Daniel Boone National Forest and private landowners to ensure that the regions' climbing areas remain open and accessible to all climbers. The RRGCC's involvement with the Daniel Boone National Forest began in the late 1990s after local climbers began to organize in response to the Forest Service's issuance of the "1996 Rock Climbing Management Guide". The RRGCC was founded in November 1996 as a means to improve relations between climbers and the Forest Service and to promote climbers interest in ensuring continued access to climbing in Red River Gorge.

In February 2000 the RRGCC formalized its relationship with the Daniel Boone National Forest via a Memorandum of Understanding (MOU). Under this MOU the RRGCC carried out several climbing area related projects including construction of system trail access for Military Wall and Left Flank. The RRGCC also provided assistance in conducting a Phase II archaeological investigation for a rockshelter at Military Wall. All three of these projects were carried out with monetary support obtained through the Access Fund Climbing Preservation Grant Program. Under this MOU the RRGCC also disseminated general information about climbing in Red River Gorge and specific information about protection of endangered species and cultural resources. The RRGCC was an active participant in the Red River Gorge Limits of Acceptable Change (LAC) process. We believe that the continued implementation of the LAC outcome is crucial to maintaining and expanding rock climbing opportunities in Red River Gorge while minimizing potential impacts from this recreational activity. One outcome from LAC was the development of a new updated MOU between the RRGCC and the Forest Service (FS Agreement No. 19-MU-11080200-341) which was signed on December 12, 2019. This MOU provides a vehicle by which the RRGCC and the Access Fund can work with the Forest Service in support of the climbing related management actions proposed in the Red River Gorge Management Planning project. For more information about the RRGCC, visit rrgcc.org.

Comments

The Access Fund, RRGCC, international, national and local climbing communities treasure the climbing resources available in Red River Gorge (Gorge). The climbing in Gorge and the wider Red River Gorge area is internationally renowned, and is consistently listed as one of the top ten climbing destinations in the world. The first known climbing in the Gorge is said to have begun in the 1950s with spelunkers who used Caver's Route at Tower Rock to practice vertical caving techniques. The solid, high quality sandstone cliffs situated along the Red River and its tributaries provide an outstanding, scenic and special climbing experience for climbers of all abilities. The area included in these plans contains more than 890 climbing routes ranging from easy to very difficult (5.1-5.14).

Access Fund and RRGCC applaud the Forest Service for their thoughtful recognition of climbing and incorporation of climbing management considerations in the Red River Comprehensive Management Plan and the Red River Gorge Management Planning, Draft Environmental

Assessment and Finding of No Significant Impact. While we support the Red River Plan and the Proposed Action of the EA, we have concerns related to trails and access, managing cliffside access, parking and road access, and a process for authorizing new climbing routes or areas.

More specifically, we appreciate the climbing acknowledgements, inventory, issues and objectives¹ presented in the plans, and follow through on goals outlined in both the 2004 Forest Plan and Limits of Acceptable Change Process. We have outlined our support, recommendations, questions and concerns below.

Trails and Access

We generally support the plan's goals and direction for a sustainable trail system and sustainable recreation, and providing new system trail access to climbing areas. We do not support decommissioning social trails which provide climbing access. Some climbing area access relies on social trails and cross-country travel. Restriction of non-system access to climbing ostensibly closes climbing areas and should require site specific consideration involving DBNF, climbing organizations and the climbing community to analyze use and impacts and find balanced management solutions. Use of erosion control techniques is one method of addressing unsustainable impacts at undesignated recreational sites and on non-system trails. Additional clarity is needed on how the plan relates to or uses a proposed re-aligned system trail network as described in the Limits of Acceptable Change process, where climbing access trails are one category of system trail, alongside hiking trails and system trails.²

Support for education

We support using education³ as a management tool to minimize impact. Research shows the climbing community supports and follows LNT and Climber's Pact practices⁴. Climbers are very much an environmentally-conscious group. A widespread commitment to conservation, extremely high compliance rates for seasonal raptor closures, and many hours of volunteer time devoted to stewardship all attest to the desire climbers have to protect the places they love to climb in. As such, we strongly support education initiatives to safeguard flora and fauna from recreational impacts. Doing so falls in a spectrum from general education about LNT practices to targeted closures of sensitive areas. We support site specific management based on quantifiable surveys and data, and are happy to work with the Forest on devising management strategies and communicating regulations and LNT practices to the climbing community.

¹ Draft Red River Comprehensive River Management Plan, Cumberland Ranger District, Daniel Boone National Forest, June 2021, 3.C.3-Goal 4, page 37.

² LAC Step 9 - Implement Action & Monitor Conditions, Propose a re-aligned system trail network in RRG. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5346492.pdf

³ Draft Red River Comprehensive River Management Plan, Cumberland Ranger District, Daniel Boone National Forest, June 2021, page 28

⁴ Economic Impact of Climbing in Kentucky's Red River Gorge, 2021. Found at <https://cedet.eku.edu/sites/cedet.eku.edu/files/files/RRG%20EIS%202020%20final%20report%2062121.pdf>

Partner with climbers

We support the priority these plan's place on partnership to accomplish planning, education and management goals. DBNF should continue to consider RRGCC, Access Fund and the climbing community as partners. This partnership is proven, longstanding, and recorded in both a DBNF and USFS MOU. We are also ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, and other management needs the Forest may require to provide for sustainable climbing opportunities in the Gorge. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program⁵, support from Access Fund Climber Steward education programming or assistance from our Conservation Team⁶, which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

Managing Cliffside Access

Climbers rely on cliffside access and generally support work and direction outlined in the plan to stabilize, rehabilitate and make resilient these heavily used and highly valuable climbing and recreation sites⁷. Additionally, the climbing community, Access Fund and RRGCC are committed to preserving and protecting sites with archeological resources or other historical or cultural significance and value. We encourage DBNF to continue to work with RRGCC and Access Fund to prioritize and accomplish work at these highly valued climbing sites. We appreciate DBNF for including cliffside access in the plan and creating a framework for stewardship work to improve sustainability and access. To clarify cliffside access stabilization and hardening we suggest adding language that defines cliffside access stabilization as including associated approach paths. We also suggest further clarity around the definition and process for "unauthorized or degraded climbing routes" as a project design element⁸.

Clifty Wilderness Fixed Anchors

Clifty Wilderness is home to many popular and historic climbing areas and nearly 200 climbing routes which rely on fixed anchors for ascent and descent. We understand the Forest Plan prescribes no new climbing routes with fixed anchors⁹, but still allows maintenance or replacement of fixed anchors on existing routes. We support Wilderness climbing, continued access to climbing in Clifty Wilderness, and the essential ability to maintain or replace fixed anchors by non-motorized means (the 2004 Forest Plan incorrectly states "non-mechanized"¹⁰; The Wilderness Act prohibits "motorized equipment and

⁵ <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

⁶ <https://www.accessfund.org/pages/conservation-team>

⁷ Red River Gorge Management Planning Draft Environmental Assessment and Finding of No Significant Impact, Cumberland Ranger District, Daniel Boone National Forest, June 2021, Page 15-16

⁸ " Page 49

⁹ Land and Resource Management Plan for the Daniel Boone National Forest, Revised April 2004, Page 3-41

¹⁰ Land and Resource Management Plan for the Daniel Boone National Forest, Revised April 2004, 2.A-REC-5, Page 3-41

mechanical transport”). Fixed anchor maintenance protects the Wilderness resource and ensures safe, sustainable Wilderness climbing experiences.

Roads and Parking

DBNF’s roads and parking are critical to climbing access. We support further work in the plans to find or create sufficient parking to provide access to all 50 climbing areas along Indian Creek, KY 715 and KY 77. In making a shift from user created parking to established parking¹¹, closure or restriction of parking in undesignated areas should be carefully considered with climbing organizations and the climbing community if doing so potentially results in a loss of or restriction to climbing access.

New Climbing Routes and Areas

DBNF should also address the need for new climbing areas and routes in these plans. We recognize the plans address outstanding planning, mitigation and restoration needs, in part related to high levels of recreational use. We are committed to helping the Forest address these needs. However, the general Forest Plan¹² and the Limits of Acceptable Change process also set the goal of providing new climbing opportunities, and providing a process for possible authorization of new climbing routes or areas through a climbing management plan¹³. The climbing community has long advocated for implementation of this guidance on Wilderness and non-Wilderness designated lands in Daniel Boone National Forest. With respect to Wilderness climbing, The Wilderness Act of 1964 notes that “unconfined recreation” is a Wilderness value that should be fostered and protected. New climbing routes in designated Wilderness embody the Wilderness value of “unconfined recreation” and should be considered an appropriate activity.¹⁴ We recommend that the plans propose a new route authorization process, for Wilderness and non-Wilderness, that allows climbers to request permission to establish new routes. Permission could be granted after cultural and environmental analyses. The climbing community has long advocated for implementation of this guidance, which should be addressed in the current draft plans.

Access Fund and RRGCC Partnership and Assistance

Access Fund, RRGCC and the climbing community are ready, willing, and able to help planners

¹¹ Red River Gorge Management Planning Draft Environmental Assessment and Finding of No Significant Impact, Cumberland Ranger District, Daniel Boone National Forest, June 2021, Page 4 and 8

¹² Land and Resource Management Plan for the Daniel Boone National Forest, Revised April 2004, Page 2-15: “Goal 7.3 Provide additional rock climbing, equestrian, and OHV trail riding opportunities.” And Page 3-7, 1.C-REC-2.

¹³ LAC Step 9 - Implement Action & Monitor Conditions, Climbing Management Plan. “This document will go into detail about how climbers can apply for permission to develop ne climbing routes...”https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5346492.pdf

¹⁴ Access Fund and American Alpine Club Fixed Anchor Policy. Found at: https://d1w9vyym276tvm.cloudfront.net/assets/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf?mtime=20200711221300&focal=none

identify and improve the climbing related trail system, parking, and other management needs the Forest Service may require to provide for the outstanding opportunities found in Red River Gorge.

The RRGCC maintains an active and ongoing positive partnership with the Cumberland Ranger District staff who manage the Red River Gorge as well as staff in the Forest Supervisor's office who are responsible for planning and working with volunteer organizations in the implementation of work projects.

In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program; assistance from our land acquisition staff or assistance from our Conservation Team which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

Justice, Equity, Diversity, and Inclusion (JEDI)

Access Fund and RRGCC urge DBNF to work with the local community to advance inclusive and equitable access to the Red River Gorge area, its climbing and wider recreational opportunities. It is well documented that low-income communities and people of color lack access to outdoors spaces and use them at lower rates than their upper-income and/or white peers. People from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands, despite the health benefits and growing economic opportunities public lands provide. DBNF and the areas scoped within these plans should benefit and be accessible to people from a true diversity of backgrounds. Additionally, research suggests climbing can benefit low-income communities within the scope of these plans, which include some of the poorest counties in Kentucky and the U.S.¹⁵ We support efforts included in the plan to work with Shawnee and Cherokee Tribal Governments, and to address impacts of the plans on minority and low-income communities¹⁶. Access Fund and RRGCC are ready and willing to offer our time and resources to assist the DBNF on JEDI, climbing and recreational access issues.

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Thank you for your consideration of these comments and for your well-informed inclusion of climbing in the draft plan. Access Fund and RRGCC have the experience, partnership, and

¹⁵ Economic Impact of Climbing in Kentucky's Red River Gorge, 2021. Found at <https://cedet.eku.edu/sites/cedet.eku.edu/files/files/RRG%20EIS%202020%20final%20report%2062121.pdf>

¹⁶ Red River Gorge Management Planning Draft Environmental Assessment and Finding of No Significant Impact, Cumberland Ranger District, Daniel Boone National Forest, June 2021, Page 30

resources to help Forest Service planners craft management strategies that encourage climbing while sustaining the health and integrity of Red River Gorge's special landscape and recreational opportunities. Access Fund and RRGCC look forward to continuing to work with the Forest Service. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone 828-545-7362 or email (zachary@accessfund.org) to discuss this matter further.

Sincerely,



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Access Fund
Vice President of Programs & Acquisitions



Billy Simek
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Cc:

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