BOULDER CLIMBING COMMUNITY

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Comments Regarding USDA Forest Service Manual Amendment 2355-2026-1: Climbing Guidelines

We are the Boulder Climbing Community (BCC), which promotes stewardship and responsible climbing, focusing on the Front Range of Colorado. Representing a large network of members and followers, we have a keen interest in the USFS draft directive regarding climbing opportunities (amendment 2355-2026-1). Our geographic area is one of the nation's principal USFS climbing areas, whether measured in climbs or climbers, both of which number in the tens of thousands.

There are two principles, both fundamental to USFS management of its resources in general and climbing areas in particular, that we wish to highlight before addressing any of the substance of the draft Forest Service guidance. First, we strongly support the management of public resources through well-funded programs. Effective federal management of the areas at issue in this proposed management guidance is vital to preserve both the ecological and recreational resources they contain. Second, there must be continued public access to Forest Service lands for a wide range of recreational activities. Such recreation is not only hugely beneficial to peoples' health and enjoyment, but it also undergirds broad, ongoing public support for keeping these resources in public hands.

Because the USFS climbing areas in our region are non-wilderness, we will focus our comments on those sections of the proposed directive. In general, the directive does a good job balancing the competing considerations. We offer a few specific suggestions.

First, the directive should clarify that existing fixed anchors and routes are to be preserved and should be allowed to be maintained, whether in a climbing management plan or in the absence of such a plan. Importantly, this also means that existing fixed anchors and climbing routes should be preserved and maintained even during any period of time that a Forest intends to adopt a climbing management plan but has not yet completed the process to do so.

The EXPLORE Act, Section 122(e), provides for the "continued use and maintenance of recreational rock climbing routes (including fixed anchors along the routes) in existence as of [January 4, 2025]." The USFS draft (section 2355.31), by contrast, is much narrower and only provides that existing anchors "may be used when consistent with the applicable climbing management plan" and that "replacement of fixed anchors [is appropriate] … when neither restricted nor prohibited in a climbing management plan." There are two changes that should be made here:

A. The directive should make clear that such climbing management plans, if any, must provide for the preservation of these legacy routes. The draft could be read to imply that local USFS decision-makers have broad discretion not to preserve such routes in their climbing management plans. That position cannot be squared with the EXPLORE Act.

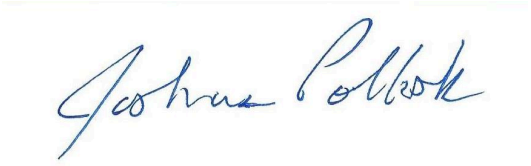
B. There is a need for guidance on preservation of fixed anchors in the *absence* of such a plan. This is a critical issue because some districts may not adopt such a plan and others may only do so after many years. In the meantime, existing fixed anchors will continue to age, and much of the fixed anchors placed multiple decades ago are, and will increasingly be, in need of replacement. Climbers around the country are actively working on such replacement in their areas. In the central Front Range of Colorado, the BCC has replaced more than 7,000 fixed anchors — many of which are on USFS non-wilderness lands — and we estimate there are at least three times that many installed across the region, a significant number of which will need replacement in the coming years. Having that vital process potentially be in limbo for an extended period of time while awaiting a climbing management plan, if any, would seriously threaten climber safety and contravene the EXPLORE Act.

Second, the directive should instruct local USFS decision-makers on the importance of consultation and communication with area climbers and climbing organizations, both in developing climbing management plans and on decisions with regard to specific fixed anchors. One model that has worked well in the Front Range, and has been adopted by several state and local land managers, is to formally convene a group of qualified local climbers to review fixed

anchors. The land manager retains ultimate authority, with the local “fixed hardware review committee” serving as an advisory body. Having a formal structure for obtaining climber input saves considerable land manager resources, as it is challenging for non-climbers to evaluate the merits of a specific fixed anchor or route. These groups can also provide an efficient way to gather broader climber input in an organized fashion. Not all areas of the country are well-positioned to have such formal climber representation and, as a result, local USFS decision-makers need discretion on how best to gather climber input and whether to convene a formal climber fixed anchor review group. But, in exercising that discretion, local USFS decision-makers would benefit from explicit direction from USFS on the importance of climber consultation and support for convening a formal group where the local climber community can effectuate that.

Finally, local USFS decision-makers should be instructed to rely on the best available science and established practices, both in evaluating the impacts and benefits of any fixed anchor proposals and in adopting rules for fixed anchor installation and management in any climbing management plan. This may be implicit, but it should be made explicit. Decisions on the contents of a climbing management plan, if any, and decisions on specific fixed anchors or equipment should be based on such best available science and practices.

Thank you for considering these suggestions.



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