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Comments: Red River Gorge Climbers' Coalition Opening Comments

Thank you for providing this opportunity for the Red River Gorge Climbers' Coalition to submit comments to the USDA Forest Service on the proposed Forest Service Manual, Service Wide (Washington Office) Section 2355 - (FSM 2355) Climbing Opportunities #ORMS-3542 national directive. The Red River Gorge Climbers' Coalition (RRGCC) is a 501(c)(3) non-profit local climbing organization (LCO) and an affiliate of the Access Fund. 523 climbers are paid members of the RRGCC along with approximately 120 climbers having joint RRGCC/Access fund memberships. The RRGCC also maintains a current Memorandum of Understanding with the U.S. Forest Service, Daniel Boone National Forest (FS Agreement No. 19-MU-11080200-341).

The RRGCC's mission is to secure and protect open public access to rock climbing in the Red River Gorge Area of Kentucky and to promote conservation of the environment on the lands where we climb. Our measure of our success is the number of individual rock climbing routes that are open to the public. The RRGCC also values the world class climbing opportunities found in Red River Gorge as a national treasure deserving of our best efforts to preserve for all climbers to enjoy, experience, and appreciate. We also value rock climbing as being good for both individuals and local communities.

Our organization was founded in 1997 in response to a bolting prohibition instituted in by the Daniel Boone National Forest (DBNF). Accordingly the RRGCC has a long history of engagement with the USDA Forest Service in addressing climbing management issues. Thus we assert that our organizations engagement with the Forest Service firmly establishes our standing in this matter. We further assert that the results of the RRGCC's twenty-six years of engagement with the Forest Service sets climbing management precedents and demonstrates that significant revisions to FSM 2355 are warranted. Such revisions are required to avert the undue burdens and restrictions that the Red River Gorge climbing community has endured for the past three decades from being imposed nationwide. This will be made obvious by the detailed Red River Gorge climbing management history as summarized below. Our closing comments provide further clarification on how the FSM 2355 climbing management approach should be revised to ensure that climbing development on public lands is not burdened by over restrictive conditions that would be imposed by the national directive as currently proposed.

Red River Gorge Climbing Management History

1991 to February 2000 - In response to cultural resource assessments conducted for Red River Gorge (RRG) logging areas in 1991, potential impacts of rock climbing activities on cultural and biological resources came into question. As a result the DBNF instituted a bolting prohibition for the RRG Area, including Clifty Wilderness in 1993. In January 1996, after holding a series of task force meetings with climbers and other interested parties, the bolting prohibition was lifted when the DBNF approved a Rock Climbing Management Guide (RCMG) for the Stanton (now Cumberland) Ranger District establishing rock climbing standards and guidelines for the area. The RCMG allowed climbers to maintain bolts on existing climbing routes. In Clifty Wilderness the RCMG also allowed climbers to maintain bolts on existing climbing routes using hand tools only. The RCMG provided standards and guidelines for developing new climbing routes and areas. Under these standards and guidelines, climbers were allowed to submit written proposals for new route development. The potential impacts of the proposed route(s) were to be assessed in compliance with the National Environmental Policy Act. Accordingly a number of proposals for new routes (about 24) were submitted by climbers, however due to time and budgetary constraints of the Forest Service, not all of these proposals were able to be processed during the period that the RCMG was in effect and only five (5) new sport climbs (i.e. those relying on fixed anchor bolts for safety protection) were approved.

During the time that the RCMG was in effect, Forest Service biologists and archaeologists also began to assess RRG climbing areas for the presence of cultural and biological resources along with other possible conflicts. This resulted in the closure of some thirty (30) sport, traditional, and bouldering climbing routes. Subsequently, RRGCC volunteers worked with the Forest Service to place informational signs at the closed climbing areas and

other areas fenced off to protect these resources. Also, with approval from the Forest Service on May 1, 1998, RRGCC volunteers constructed new trails for two popular RRG climbing areas supported by funding from the Access Fund Climbing Preservation Grant program.

February 2000 - On February 7, 2000 an MOU was signed between the Forest Service and the RRGCC at the DBNF Winchester office formalizing a cooperative relationship between the two organizations.

April 2004 - After receiving comments from the public, including the RRGCC and individual climbers, the DBNF approved a Revised Land and Resource Management Plan (2004 Forest Plan) that established forest-wide recreational standards that superseded the RCMG. In the Cliffline Community prescription area the 2004 Forest Plan generally provided that, "Dispersed recreation (e.g., hiking, rock climbing, rappelling, bouldering, and camping) is generally allowed unless adverse impacts to PETS species, habitat for Conservation species, or heritage resources listed or potentially eligible for listing on the National Register of Historic Places, cannot be mitigated."

The 2004 Forest Plan also established the following climbing management standards:

"Any new areas developed for cliffline related recreation activities, e.g. rock climbing, bouldering, or rappelling must receive Forest Service authorization prior to development. Improvements to existing developments that may substantially increase the use of a cliffline related area must also receive prior authorization from the Forest Service. Activities that constitute development include, but are not limited to:

Permanent installation of safety devices such as bolts, straps, cam devices, or chocks

Construction of an access trails

Clearing of vegetation"

And for Clifty Wilderness:

"No new rock climbing routes with fixed anchors are allowed. However, maintenance or replacement of existing approved fixed anchors is allowed by non-mechanized means."

Additionally the 2004 Forest Plan established the following Goals and Objectives:

"Complete Limit of Acceptable Change Process with public input. Through the Limits of Acceptable Change Process, manage recreation use to mitigate unacceptable resource damage and crowding that can result from heavy recreational use."

LAC 2004 to 2007 - The RRGCC organized a committee of climbers to represent the Coalition during the RRG LAC process. By means of this committee, climbers' interests were promoted during the three year LAC process. Climber involvement in LAC resulted in the development of a set of standards for climbing site impacts and a toolkit of management actions to be implemented should these impacts exceed the Limits of Acceptable Change. December 2009 - Climbers approached the RRGCC asking for guidance about replacing bolts at Funk Rock City, a climbing area located in Clifty Wilderness. The RRGCC contacted the Forest Service about climber's intent to replace the bolts and discussed the matter with the RRG Manager. The Forest Service indicated that anchor replacement was allowable under the 2004 Forest Plan as long as no power drills were used (i.e. hand drills only) and the size of the group conducting the work was kept to ten climbers or under. Using non-mechanized means climbers subsequently installed low profile stainless steel anchors and removed the outdated original hardware at this climbing area.

Subsequently, climbers approached the RRGCC asking for guidance about replacing nylon slings and removable gear left behind as top anchors on traditional climbs outside of Clifty Wilderness. As replacement of such anchors was allowable under the 2004 Forest Plan, climbers were advised that replacement of the removable gear using bolted anchors would be acceptable.

November 2013 - Climbers found graffiti at a climbing area in the Red River Gorge Geologic Area. The RRGCC notified the Forest Service and offered assistance in remedying the incident. By the time a backcountry ranger went to climbing area on November 13, 2013, the graffiti had been covered over with a rock colored paint. However, the ranger discovered another area of graffiti lower down on the cliff face. The RRGCC contacted other

LCO's that had experience with graffiti removal. The graffiti was then removed by local climbers.

August 31, 2015 - During a celebration held by the Forest Service at the Gladie Visitors Center the RRGCC, along with other organizations and individuals, were recognized for their contributions to protecting the endangered White Haired Goldenrod plant that is only found in the RRG. The proposed delisting of the White Haired Goldenrod is also announced at this event.

October 2019 - On October 12, 2019 an updated MOU was signed between the Forest Service and the RRGCC during the Coalition's annual Rocktoberfest climbing festival. This signing was the culmination of seven years of negotiation on the update that recognized the results of the LAC process:

Renegotiate/Update Memorandum of Understanding between the USFS and the Red River Gorge Climbers' Coalition to include results of LAC process.

Develop a Climbing Management Plan that includes new route development guidelines in existing areas, procedures for new climb areas, trail access, maintenance routes.

Process applications for new climbing development per Forest Plan standards & LAC standards

Establish new climbs of the same grade (difficulty) to spread out use.

2020 to Present - On April 5, 2022 the RRGCC executes a Volunteer Service Agreement 22-VS-11080211-0001 to Trail Maintenance. In November 2023 a monthly check-in meeting between the RRGCC and DBNF staff was initiated as a way to improve communication and cooperation between the two organizations. These recurring meetings are to be held on the second Monday of each month. Additionally, in 2023 the Access Fund launched the inaugural season of the Red River Gorge Climber Stewards program in partnership with the RRGCC, DBNF, and Friends of Muir Valley to educate climbers about Leave No Trace principles. Forest Service personnel participating in this outreach included Cumberland District Ranger, Bradley Davis and Botanist, David Taylor.

Red River Gorge Climbers' Coalition Closing Comments

In closing, the RRGCC's history with the USDA Forest Service (FS) in Red River Gorge presents a national example and model for developing a more reasonable nationwide climbing management direction than provided in FSM 2335. The current action as written threatens to reverse the RRGCC's decades of work and progress in climbing management working cooperatively with the FS and Access Fund. We call for the FSM 2335 action to be withdrawn and for the Forest Service to work with the Access Fund and its affiliated LCO's on developing management policy revisions that would allow climbers to recreate responsibly on Forest Service lands. Our policy revision comments are stated below.

The FSM 2335 climbing management policy is a top down, one-size-fits-all approach that if adopted will effectively result in a nationwide prohibition on climbing development, fixed anchor maintenance, and new fixed anchor placement for decades to come. Because maintenance and placement of fixed anchors is crucial to climber safety, FSM 2335 if adopted, will most likely result in climber injuries or even deaths.

The FSM 2335 reliance on the development of Climbing Management Plans before actions can be taken by climbers is unworkable. As the RRGCC's history proves, it takes an enormous amount of effort on the part of climbers to make progress in translating FS policy into actions. It took our organization three years just to update our MOU with the Forest Service. After three decades of effort, climbing development involving new fixed anchor placement remains on hold in the DBNF. Progress has been made with the Forest Service in discussing where and how such development could occur. A Climbing Management Plan outline and example section has been developed for the RRG area. However, a considerable amount of work remains before a comprehensive RRG Climbing Management Plan may even be ready for review.

Each FS administrative unit has unique conditions and recreational opportunities. The RRGCC requests that the climbing management policy approach in FSM 2355.03 be revised to be based first on unit specific conditions and direction. Specifically, the climbing management direction for each administrative unit should be determined from the desired conditions, standards, and guidelines established in Land Management Plan. Climbing management plan development should then be consistent with recreational goals, standards, and desired future conditions provided in a Land Management Plan. Such revisions would provide a significant improvement from

the current top down approach by accommodating unit specific input from FS staff, the public, and the local rock climbing community.

In the RRGCC's experience, the lack of funding and resources available within the FS for their involvement with climbing management is a significant impediment to making progress. The RRGCC requests that revisions to FSM 2335.03 - Policy and FSM 2335.21 - Climbing Management Plan should include FS procedures for securing funding and resources in support of climbing management objectives through agency budgeting and congressional appropriations.

To allow flexibility in climbing management direction and allowable actions in each FS unit, including replacement of existing fixed anchors and climber education on LNT/ethics, the RRGCC requests that FSM 2335.31, FSM 2335.31, and FSM 2335.03 be revised to provide for such actions to be determined in Land Management Plans. As established by the DBNF Land Management Plan, the FSM 2335.03 revisions should also reflect a policy direction of allowing maintenance of fixed anchors to be performed by climbers.

Provisions for public safety, search and rescue, and other emergency procedures, should not be reliant on Climbing Management Plans and the RRGCC requests that such language be removed from FSM 2335.21 - Climbing Management Plan. In RRG such provisions have been developed through the DBNF working with local emergency management services and the Kentucky National Guard. Local search and rescue organizations have also been established that can provide technical support and coordination when requested by EMS. Actions that the RRGCC has pursued to improve climber safety include assisting guidebook authors in publishing emergency information in climbing guidebooks, providing backpack tags with emergency information to climbers, and providing climbing guidebooks for use in emergency vehicles.

The RRGCC requests that FSM 2355.21 - Climbing Management Plan be revised to place more emphasis on working with LCO's and climbers in regards to Climbing Management Plan preparation and guidance on fixed anchor and fixed equipment replacement by climbers. FSM 2335.03 - Policy establishes that climbers are responsible placement and replacement of fixed anchors. Thus it is crucial for ensuring safety that guidance on fixed anchor placement and fixed anchor replacement is prepared with substantial input from climbers. The DBNF has worked with the RRGCC to allow climbers the freedom to establish and maintain fixed anchors for approved climbing opportunities in RRG.

The RRGCC requests that policy direction language for conducting law enforcement patrols at climbing opportunities be removed from FSM 2355.3 - Climbing Management. Using law enforcement to in regard to climbing activities would be a waste of precious Forest Service resources. As demonstrated by RRGCC history, compliance with climbing management restrictions and protection of resources is best accomplished by cooperation between the Forest Service, LCO's, and climbers. In RRG, climber cooperation with law enforcement has been productive in addressing vehicle break-ins. Vehicle thefts present a serious problem for recreational users including climbers. By working with FS law enforcement, climbers have provided assistance in apprehending perpetrators. In several such instances suspects were apprehended and found to be involved in drug related activities. In one graffiti incident climbers were able to determine that the graffiti was most likely a gang tag. Vehicle thefts were also a topic of discussion during the LAC process. In discussions with archaeologists, climbers were informed that when law enforcement tracked down looters of archaeological sites, climbing equipment sometimes be found among other stolen articles. As a result of this discussion, the archaeological community recognized that the presence of climbers along cliffline areas was a deterrence to looters.

The proposed FSM 2355.03 - Policy direction for fixed anchors and the management direction of FSM 2355.32 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness are inconsistent with the intent of the Wilderness Act. The RRGCC requests these sections be revised to allow such management to be determined and tailored to the specific conditions for each FS unit, first in a Land Management Plan, and then as may be detailed further in a Climbing Management Plan. The existence of fixed anchors in Wilderness Areas is primarily experienced only by climbers and not the general public. As has been demonstrated by RRG climbers under the DBNF Land Management Plan, such maintenance can be performed in a manner where impacts to the wilderness experience are minimized.

To ensure climber safety, the RRGCC also requests that the policy direction for Wilderness Areas in FSM 2355.03 be revised to generally allow for historically present fixed anchors to remain and to be maintained.

Likewise the RRGCC requests that FSM 2355.32 - Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness be revised to allow the Forest Supervisor to authorize replacement and retention of existing fixed anchors at their discretion.