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First name: Bill

Last name: Strachan

Organization: Red River Gorge Climbers' Coalition

Title: Executive Director Emeritus

Comments: Jonathan P. Kazmierski

Cumberland District Ranger

Daniel Boone National Forest

2375 KY 801 South

Morehead, Kentucky 40351

Phone: (304) 399-5924

Submitted via online form and email: jon.kazmierski@usda.gov

RE:Red River Gorge Management Planning

Dear Mr. Kazmierski:

I appreciate this opportunity to provide comments on the Red River Gorge Management Planning Project. The purpose of this letter is to support and provide additional details in regards to the comments provided jointly by the Red River Gorge Climbers' Coalition, Inc. (RRGCC) and the Access Fund on this project.

Background

I first learned to rock climb in 1972 while taking a Standard Course at the Voyageur Outward Bound School. Then in 1973 during my freshman year at the University of Cincinnati I joined the University of Cincinnati Mountaineering Club and began going on trips to Red River Gorge. At that time the Gorge was not known as a rock climbing destination. During a trip to Indian Staircase in 1975 I saw that the wall next to the staircase appeared climbable. On my next trip to Indian Staircase I brought my gear and we top roped climbed at several places along the wall. Since that time I have spent countless hours and days exploring for areas of cliffline that might be climbable, establishing new climbing routes, and climbing the routes of others. Red River Gorge has become for me what is called in the climbing community my home crag.

My first involvement in climbing access occurred in the 1980's when I attended a meeting about the proposed closure of rock climbing in what is now the Clifton Gorge State Nature Preserve. In 1994 I joined the Board of Trustees of the Ohio Climbers Association and served as the OCA President from 1997 to 2004. In 2004 I was asked by RRGCC founder Shannon Stuart-Smith to join the RRGCC Board and was elected President in December 2004. After serving a one-year term as RRGCC President, I was appointed as the Coalition's 2nd Executive Director. In June 2016 I retired from my position as Executive Director and have served as an advisor to the RRGCC ever since as Executive Director Emeritus.

Comments

Red River Comprehensive River Management Plan

Forest Service recognized climbing areas within or adjacent to the Wild & Scenic River corridor include Long Wall, Window Wall, Chimney Top Rock, Tower Rock, the three Small Wall's, Hen's Nest, Doorish Wall, Woody's Wall, Eagle Point Buttress, and Wall of Denial. Rock climbing routes in these areas are climbed using traditional methods with fixed anchors, if any, occurring at the top of the climb. The mapping in the Red River Comprehensive River Management Plan does not provide sufficient detail to determine which climbing areas are within the proposed river corridor. Regardless, all of these climbing areas provide an experience of remoteness

with high scenic integrity, especially for those climbing areas located in Clifty Wilderness along the Wild corridor where the sound of the river enhances the feeling of remoteness.

On page 29 of the Comprehensive River Management Plan, under the heading of Potential Future Management Actions "discourage off-trail use" and "regulate and enforce restriction on off trail travel,... climbing routes" are listed. Off trail access to off-trail climbing routes contribute to the experience of remoteness. Where climbing exists within the Wild & Scenic River Corridor regulation and enforcement of off-trail access to off-trail climbing should be removed from consideration in the Plan as management actions. Where opportunities exist and are appropriate, new system trail access to off-trail climbing and stabilization impacted climb sites should be pursued as proposed on Page 27 of the plan in cooperation with the RRGCC and the Access Fund.

Red River Gorge Management Planning

Limits of Acceptable Change

The Limits of Acceptable Change (LAC) process which concluded in 2008 and its recommendations, zones, and proposed management actions are significantly referenced in the Draft Environmental Assessment, Finding of No Significant Impact (Draft EA/FONSI) document. While Shannon Stuart-Smith was RRGCC Executive Director she strongly encouraged the Daniel Boone National Forest to conduct an LAC process for Red River Gorge. While serving as RRGCC Executive Director, I led a committee of climbers, including Shannon, who regularly participated in LAC meetings and participated in determining LAC zones and climbing management actions.

The result of Step 7 of the LAC process was a list of management actions that will be taken if and when conditions are found that do not meet standards. An entire page from Step 7 is dedicated to Climbing Areas & Climb Sites management actions that were developed with climber input. One significant climbing management action from Step 7 that has already been completed is the renegotiation and updating of the Memorandum of Understanding between the USFS and the RRGCC to include results of LAC process. However, on page 6 of the Draft EA/FONSI under the heading Cliffside Access and Stabilization no reference to LAC recommendations is provided. To acknowledge the LAC results for Climbing Areas & Climb Sites in this section and to indicate flexibility implementing these management actions it is suggested that the first sentence be revised to read, "Through partnerships with local recreation and volunteer groups, and using adaptive management in accordance with LAC recommendations, we propose to stabilize, rehabilitate, and increase resiliency of approximately 267,550 square feet (6.14 acres) across 12 or more potential heavily impacted cliffside access locations as listed in Table 10 below."

The square footage proposed for stabilization and rehabilitation appears to be significantly greater than the previously measured or estimated impacts of the twelve potential stabilization sites listed in Table 10. Also, three of the potential stabilization sites have lesser measured impacts in comparison to other climbing areas within the same ROS Class. To better reflect measured impacts in the twelve potential locations listed in Table 10 it is suggested that Dip Wall be removed and replaced with Sky Bridge Ridge in the RRGGA area, that Eagle Point be removed and replaced with Wall of Denial in the Clifty Wilderness, and that Moonshiner's Wall be removed and replaced by Mariba Fork also in the Clifty Wilderness.

Another significant climbing management action included Step 7 of LAC relevant to Red River Gorge Management Planning Project is the development of a Climbing Management Plan. Development of such a plan would be very useful in prioritizing climbing impact related projects and coordinating climbing area specific parking and trail access improvements. Therefore it is suggested that the following sentence be inserted after the first sentence in the Cliffside Access and Stabilization section, "To facilitate development of sustainable access and infrastructure for cliffside recreation locations we propose to work with climbing groups in developing a Climbing Management Plan for Red River Gorge."

Parking

It appears that existing parking and potential locations for additional designated parking spaces listed in Table 9 of Draft EA/FONSI match well with a number of recognized climbing areas. For example Martin's Fork trailhead parking for Military Wall and Left Flank, pull-offs along KY 715 for Tower Rock and the Small Wall's, and Lower Swift Camp Creek parking for Funk Rock City. Careful planning will be required to provide adequate designated parking spaces for several climbing areas, including Long Wall, the Dome, Fortress Wall, and Phantasia. One possible option for Fortress Wall and Phantasia would be to provide new system trail access from the potential Tarr Ridge parking location. This could work by installing ladder or stairs from the ridge down to bottom of the cliff such as is done a New River Gorge.

Trail Access

In drawing Semi-Primitive trail corridor boundaries during LAC, an attempt was made to accommodate access to recognized climbing areas via these corridors. For example, an historic logging road (and shown as a user-created trail on LAC GIS mapping) extends in such a corridor from near the Osborne Bend trailhead east along the north side of the Red River to a creek drainage located just west of the Eagle Point Buttress wall. This logging road provides a perfect opportunity to create a formal William O. Douglas system trail that would bypass the lower portion of the informal Douglas trail that closely follows the cliff along the northern bank of the river and is eroding away. Convenient new system trail access could be provided to Doorish Wall, Eagle Point Buttress, and Wall of Denial climbing areas branching off the potential William O. Douglas system trail.

Another potential new system trail opportunity exists along Swift Camp Creek that could provide system trail access to Funk Rock City and Sky Bridge Ridge climbing areas. The overall concept for this potential trail is to extend the existing Swift Camp Creek trail north along the creek from its intersection with Rough Trail past Funk Rock City, then cross KY 715 near the Lower Swift Camp Creek parking, the extend along a bench below the Sky Bridge Ridge, and then connect back into KY 715 near the concrete bridge. A map of this concept is provided in an attachment to this letter.

In the near term planning for trail access to climbing areas I would like to close by stating that installation of a system trail to access to Long Wall has been a top priority for the RRGCC for quite some time

Your consideration of the above comments is appreciated.

Respectfully yours,

Bill Strachan, Executive Director Emeritus
Red River Gorge Climbers' Coalition, Inc.

Cc:Jereme Ransick, RRGCC, President
Billy Simek, RRGCC, Executive Director
Zachary Lesch-Huie, Access Fund, Southeast Regional Director