Red River Gorge Climbers' Coalition, Inc. *Securing and Protecting Access to Climbing in the Red River Gorge*

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July 20th, 2026

United States Forest Service
ATTN: Federal Draft Climbing Management Guidance

To Mr. Josh Nadas,

The Red River Gorge Climbers' Coalition welcomes this opportunity to comment on the USFS draft guidance for climbing management. Public input is vital to making future management of climbing resources on National Forest lands successful. The Daniel Boone National Forest of Eastern Kentucky provides world class rock climbing opportunities found in and around the Red River Gorge.

The 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 which host extensive climbing, the RRGCC works with its local USFS branch, the Daniel Boone National Forest, and private landowners to ensure that the region's 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 USFS is proposing a variety of shifts in climbing management guidance that will impact how forest districts address the installation, use, and maintenance of "fixed anchors" and safety bolts in and outside of wilderness zones on National Forest Lands. We acknowledge and support that this draft guidance

recognizes climbing as legitimate use of USFS lands, including wilderness, and correctly differentiates between limited instances of fixed anchors and "installations" that require formal minimum requirement analyses. The EXPLORE act protects climbing that relies on "fixed anchors", which are distinct from "fixed equipment". Climbers and Local Climbing Organizations are experts in discerning when and where these anchors are appropriate, and are rightly held responsible for assessing the need for and inspection of fixed anchors for purposes of safety and emergency response in National Forest and Wilderness settings.

The following clifflines within our local region of the Daniel Boone National Forest host climbing resources that utilize fixed anchors and bolts (this is not an exhaustive list of climbing resources in the Daniel Boone National Forest):

Funk Rock City (Clifty Wilderness)
Eastern Sky Bridge
Long Wall
Military Wall
Left Flank
Pebble Beach

Need for protections for Legacy routes and anchors
The vast majority of climbing resources in the Daniel Boone National Forest have been established before 2025. These resources have created a recreational experience that is utilized by thousands of visitors each year and has become part of the identity of this part of Kentucky. While it is true that in some cases climbing resources overlap with other cultural or environmentally sensitive resources, physical removal of climbing routes and fixed anchors is a damaging solution. A measurable review on a case-by-case basis should be used to determine real effects to sensitive resources, and removal of routes should be considered a last resort only after mitigation efforts are exhausted. Many routes in the Daniel Boone National Forest that were developed before 2025 serve as excellent options for accessible low-impact recreation and the benefits of protecting these resources for use in modern recreation contexts should be weighed against the impact to other potentially sensitive resources.

Anchor definitions and directives
This draft guidance correctly distinguishes between "fixed anchors" and "fixed equipment". It should be further clarified in the guidance that bolts and other fixed anchor materials qualify as "limited in size, scope, and function" when hand placed in wilderness for purposes of safety. Popular routes in the Clifty Wilderness that attract climbers from around the world utilize fixed anchors currently, and these are rarely, if ever, perceived by the public that utilizes the same trailhead. These anchors are thoughtfully and sparingly placed and serve as safety measures for recreation that is appropriate in a wilderness setting.

Climbing Management Plans (CMP)
Today, the use of CMP's is infrequent across USFS lands. The NFS manages nearly 30% of America's climbing, yet only three forest-wide CMP's exist. These plans have potential to serve as excellent recreation management tools, but take time to build and pull limited funding resources from forest districts. The integration of a CMP for the Daniel Boone National Forest may be a worthwhile resource that formalizes agreements and collaborations between the RRGCC and DBNF while also correcting language in its 2004 forest plan that has severely limited new climbing opportunities in the forest; the RRGCC would be proud to work together with the DBNF to develop that document. That being said, to require a CMP to be enacted as a prerequisite for placement, maintenance, or replacement of fixed anchors would create a prohibitively tedious process for routine recreation management practices on which the RRGCC already advises the DBNF. This would create roadblocks for action that ensures safe, sustainable recreation on climbing

resources within National Forest lands. This guidance should allow the DBNF to defer to the RRGCC to advise on when, where and how anchors are placed and maintained so long as those actions are thoughtful and limited in scope.

Climbing route authorization and maintenance

Distinction and protection of Wilderness as unique to the rest of Forest Service lands is a critical part of National Forest management, and protections for the Clifty Wilderness within the DBNF are a special part of the recreation resources we utilize. It must be noted that the Clifty Wilderness includes some of the most special climbing recreation resources in the region. These zones have potential for new climbing route development of limited size and scope, both to realize the potential of the resource and to aid in dispersing the growing number of users. These potential recreation sites should be considered and approved through a minimally prohibitive application process that allows Local Climbing Organizations to solely identify appropriate opportunities for new route development within wilderness areas. As has been the case with identifying limited, case-by-case needs to improve fixed anchors in the DBNF, the RRGCC would use discretion and prioritize conservation and wilderness values when identifying appropriate instances for new route development within the Clifty Wilderness.

Community Partnership and Support

The RRGCC is dedicated to continued partnership with the Daniel Boone National Forest in managing all aspects of climbing in the Forest. We would like to continue to work with the Forest to engage and educate the broader climbing community and foster mentorship within the community. In most recent years, this partnership has included the review and maintenance of an MOU that communicates our commitment to working toward shared interests. It has also included our organization's subsidization of stewardship programs for the DBNF, and our advice on concerns related to fixed anchors on established climbing routes for the improvement of the climbing resource. Our vision for the future of this partnership includes, but is not limited to the establishment of a baseline climbing route inventory for the DBNF, further collaboration around trail system designation and construction for climbing spaces, the directing of our volunteer labor toward DBNF climbing sites, and cost-sharing for stewardship programs that serve all partners managing climbing resources in the Red River Gorge region.

Thank you for your consideration of these comments on the PARC Act Draft Guidance for climbing management. Our organization has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. We look forward to continuing to work with the United States Forest Service. Please keep us informed as the review and integration of this draft guidance proceeds. Feel free to contact us via telephone (513.373.6229) or email (Louie@rrgcc.org) to discuss this matter further.

Sincerely,

Louie Allen

Executive Director
Louie@rrgcc.org