

**Forest Service Manual
Service Wide (Washington Office)**

**Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities**

Amendment number:

Effective date:

Duration: This amendment is effective until superseded or removed.

Superseded Directive(s): Superseded directive name, number, and date

Approved by: Christopher French, Deputy Chief, National Forest System

Date approved:

Responsible Staff: Recreation, Heritage, and Volunteer Resources (RHVR)

Explanation of changes: Following is an explanation of the changes throughout the directive by section.

Section 2355 – Establishes code, caption, and sets forth direction on Climbing Opportunities on National Forest System lands.

**Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities**

Table of Contents

2355 – Climbing Opportunities	3
2355.01 – Authority	3
2355.02 – Objectives	4
2355.03 – Policy.....	4
2355.04 – Responsibility	7
2355.04a – Washington Office, Director of Recreation, Heritage, and Volunteer Resources.....	7
2355.04b – Washington Office, Director of Wilderness and Wild and Scenic Rivers	7
2355.04c – Regional Foresters	8
2355.04d – Forest Supervisors.....	8
2355.04e – District Rangers	9
2355.05 – Definitions	10
2355.1 – Inherent Risk of Climbing on NFS Lands.....	10
2355.2 – Land Management Planning	11
2355.21 – Climbing Management Plan	11
2355.3 – Climbing Management	12
2355.31 – Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment Outside Wilderness.....	13
2355.32 – Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness	14
2355.33 – Minimizing Impacts from Climbing Activities	15
2355.34 – Public Safety	16
2355.35 – Sanitation.....	16
2355.36 – Trails.....	16
2355.37 – Recreation Special Uses	16
2355.38 – Compliance with Natural and Cultural Resource Laws.....	17
2355.4 – Volunteers	17
2355.5 – Research	18

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

2355 – Climbing Opportunities

This directive addresses climbing opportunities on National Forest System (NFS) lands. The following section provides guidance for management of climbing opportunities in wilderness and non-wilderness.

2355.01 – Authority

The principal authorities governing climbing on NFS lands are:

1. **The Organic Administration Act (16 U.S.C. 551).** This act authorizes the Forest Service to regulate the occupancy and use of national forests.
2. **Bankhead–Jones Farm Tenant Act (7 U.S.C. 1011(f)).** This act authorizes the Forest Service to regulate the use and occupancy of national grasslands.
3. **Wilderness Act of 1964 (16 U.S.C. 1131-1136).** This act specifies congressional policy to secure for the American people an enduring resource of wilderness for the enjoyment of present and future generations; defines wildernesses as areas that are untrammelled by people and that offer outstanding opportunities for solitude; directs agencies to manage wilderness to preserve natural ecological conditions; and, with certain exceptions, prohibits motorized equipment, structures, installations, roads, commercial enterprises, aircraft landings, and mechanical transport in wilderness.
4. **National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. 300101 *et seq.*).** This act obligates Federal agencies to consider the effects of their undertakings on historic properties.
5. **Archaeological Resources Protection Act of 1979 (ARPA) (16 U.S.C. 470aa *et seq.*).** This act provides for criminal and civil penalties for unauthorized or attempted unauthorized excavation, removal, damage, alteration, or defacement of any archaeological resource on Federal or Indian lands and prohibits the sale, purchase, exchange, transportation, or receipt of any archaeological resource obtained from Federal or Indian lands or offering to sell, purchase, or exchange any archaeological resource obtained from Federal or Indian lands.
6. **Section 8104 of the Food, Conservation, and Energy Act of 2008 (FCEA) (25 U.S.C. 3054).** Upon the Forest Service’s approval of a request from an Indian tribe, this act authorizes the Forest Service to close temporarily to public access specifically identified NFS lands to protect the privacy of Tribal activities for traditional and cultural purposes. Section 8102(5) of the FCEA defines the term “Indian tribe” as any Indian or Alaska Native Tribe, band, nation, pueblo, village, or other community, the name of which is included on a list published by the Secretary of the Interior pursuant to section 104 of

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

the Federally Recognized Indian Tribe List Act of 1994 (24 U.S.C. 479a1). Under section 8102(9) of the FCEA, the term “traditional and cultural purpose” with respect to a definable use, area, or practice means that the use, area, or practice is identified by an Indian tribe as traditional or cultural because of the long-established significance or ceremonial nature of the use, area, or practice to the Indian tribe.

7. **Executive Order (EO) 13007, *Indian Sacred Sites*.** This EO directs Federal agencies to accommodate access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners and to avoid adversely affecting the physical integrity of those sacred sites.

2355.02 – Objectives

1. Provide climbing opportunities that serve visitor needs and that meet land management and recreation policy objectives.
2. Provide climbing opportunities that emphasize the natural setting of NFS lands and that are consistent with applicable law and directives and the applicable land management plan and climbing management plan.
3. Provide climbing opportunities that align with management and protection of natural and cultural resources on NFS lands.

2355.03 – Policy

1. Climbing is an appropriate use of NFS lands when conducted in accordance with applicable law and Forest Service directives and consistent with the applicable land management plan and climbing management plan.
2. Emphasize appropriate and responsible use of NFS resources and resource protection in planning, developing, and managing climbing opportunities on NFS lands.
3. Develop a climbing management plan covering each administrative unit or ranger district that has one or more climbing opportunities, as required and as funding and resources allow (FSM 2355.21). A climbing management plan can cover a single climbing opportunity or multiple climbing opportunities across a variety of landscapes. Prioritize the development of climbing management plans on climbing opportunities in wilderness, and on climbing opportunities outside wilderness with the highest level of need (such as high levels of use, use conflicts, or resource degradation). Ensure that climbing management plans are consistent with applicable law and directives and the applicable land management plan, including but not limited to:

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

- a. The Wilderness Act of 1964 (16 U.S.C. 1131-1136).
 - b. The specific laws designating wilderness areas in the NFS.
 - c. The NHPA (54 U.S.C. 300101 *et seq.*), FSM 2360, and FSH 2309.12.
 - d. The Endangered Species Act (16 U.S.C. 1531 *et seq.*) and FSM 2670.
 - e. FSM 2354 and FSH 2309.18 governing NFS trails.
 - f. FSM 1563 and FSH 1509.13 governing Tribal relations.
4. Climbing has long been an important and historically relevant form of primitive or unconfined recreation consistent with the wilderness character of many NFS wilderness areas. Climbing or climbing-related activity in wilderness must be restricted or prohibited when its occurrence, continuation, or expansion would adversely impact wilderness character.
5. The placement, replacement and retention of fixed anchors and fixed equipment are permissible in wilderness when it is determined that they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. Existing fixed anchors and fixed equipment may be retained pending completion of a Minimum Requirements Analysis, as funding and resources allow, to determine whether they are the minimum necessary for administration of the area for Wilderness Act purposes (FSM 2355.32).
6. Plan and manage climbing and the placement, replacement, and retention of fixed anchors and fixed equipment in wilderness consistent with principles of wilderness stewardship.
- a. Climbing that does not rely on use and placement of fixed anchors and fixed equipment, that is consistent with Leave No Trace principles, and does not concentrate human activity constitutes primitive and unconfined recreation and may occur in wilderness unless prohibited by a closure order. This type of climbing includes the use of temporary anchors and equipment that can be removed, such as slings, cams, nuts, chocks, stoppers, and removable pitons.
 - b. The placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act, but the establishment of bolt-intensive climbing opportunities may be incompatible with the preservation of wilderness character.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

7. Forest Service personnel are not responsible for the placement or replacement, or assessing or ensuring the safety, of fixed anchors and fixed equipment on NFS lands. Climbers are responsible for placement and replacement of fixed anchors and fixed equipment when those activities are authorized by a land management plan or climbing management plan. Climbers have personal and exclusive responsibility for assessing the safety of installed fixed anchors and fixed equipment. When the Forest Service or other Federal, State, or local governmental personnel determines that placement or replacement of fixed anchors and fixed equipment is necessary to facilitate emergency operations (FSM 2355.3 and 2355.4), the Forest Service will allow the placement or replacement of fixed anchors and fixed equipment for emergency operations by climbers, the Forest Service, or other Federal, State, or local governmental personnel.
8. Develop educational and interpretive plans and materials for climbing opportunities that can be posted on an external Forest Service website and as needed, published in hard copy and that address natural and cultural resource protection, potential use conflicts, low-impact climbing practices, and outdoor ethics principles such as Leave No Trace and Tread Lightly!
9. When consistent with applicable law and directives, the applicable land management plan, and the applicable climbing management plan, issue and administer recreation special use permits to increase visitor climbing opportunities and enhance visitor education and awareness of low-impact climbing practices (FSM 2721.53; FSH 2709.14, ch. 50 and 80).
10. The Forest Service's national quality standards, including inspection and hazard mitigation, do not apply to climbing opportunities because they are not developed recreation sites (FSH 2309.13, ch. 50).
11. A via ferrata is not covered by FSM 2355. Rather, a via ferrata is a natural resource-based recreational facility that should be authorized under a commercial recreation special use authorization, such as ski area permit. See FSM 2340 and 7330 for additional direction on natural resource-based recreational facilities.
12. Ensure that requests for temporary closure by Indian Tribes to protect the privacy of Tribal activities for traditional and cultural purposes are considered, in accordance with section 8104 of the FCEA (25 U.S.C. 3054), when managing climbing opportunities on NFS lands.
13. Promote stewardship opportunities and collaboration between the Forest Service and climbing organizations.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

2355.04 – Responsibility

2355.04a – Washington Office, Director of Recreation, Heritage, and Volunteer Resources

The Washington Office, Director of Recreation, Heritage, and Volunteer Resources, is responsible for:

1. Providing leadership for planning, developing, and managing climbing opportunities on NFS lands.
2. Making budget recommendations for climbing-related projects, including planning, improvement, maintenance, operation, research, and monitoring.
3. Coordinating with national representatives of climbing organizations, other agencies, and affected Tribes and executing memoranda of understanding or other instruments, as appropriate, relating to climbing opportunities on NFS lands.
4. Working with local and national climbing organizations and manufacturers of recreational equipment to achieve climbing program objectives.
5. Disseminating information to the public to enhance understanding of the proper use of climbing opportunities on NFS lands.
6. Providing national leadership on appropriate planning, development, and management of climbing opportunities, including natural and cultural resource protection, on NFS lands.

2355.04b – Washington Office, Director of Wilderness and Wild and Scenic Rivers

The Washington Office, Director of Wilderness and Wild and Scenic Rivers, is responsible for:

1. Providing national leadership and recommendations for issues related to climbing opportunities in wilderness and wild and scenic river corridors, including management of the placement, replacement, and retention of fixed anchors and fixed equipment.
2. Providing support to the Washington Office Director of Recreation, Heritage, and Volunteer Resources in developing standards for preserving wilderness character and protecting and enhancing wild and scenic river values as well as methods for monitoring climbing opportunities in wilderness and wild and scenic river corridors, including impacts on wilderness character and wild and scenic river values.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

2355.04c – Regional Foresters

Regional Foresters are responsible for:

1. Providing direction, consultation, assistance, technology transfer, and training to administrative units in their region for planning, development, and management of climbing opportunities on NFS lands.
2. Ensuring that an adequate level of climbing management skills exists in their region or can be easily accessed elsewhere by the Forest Service.
3. Developing and maintaining effective working relationships with climbing organizations and Tribal governments.

2355.04d – Forest Supervisors

Forest Supervisors are responsible for:

1. Planning, developing, and managing climbing opportunities on NFS lands in their administrative unit and encouraging responsible use of climbing opportunities on NFS lands through visitor education on low impact climbing practices and outdoor ethics programs such as Leave No Trace and Tread Lightly!
2. Ensuring consistency of climbing opportunities on NFS lands with the applicable land management plan and other resource management plans and programs.
3. Approving climbing management plans in their administrative unit.
4. Establishing monitoring intervals and criteria, practices, a sampling basis, and standards against which the effects of climbing opportunities on NFS lands may be evaluated and reported through land management planning and management review.
5. Reducing, temporarily closing, or prohibiting climbing in their administrative unit when monitoring shows that it is directly causing, or will directly cause, considerable adverse effects. This responsibility may not be delegated to the District Ranger (FSH 5309.11, ch. 30).
6. Coordinating with interested individuals and entities, adjacent administrative units, local, State, and other Federal agencies, Tribal governments, and law enforcement officials to implement and obtain compliance with restrictions and prohibitions on the use of climbing opportunities in climbing management plans.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

7. Ensuring that informational materials on climbing opportunities address resource protection, potential use conflicts, low-impact climbing practices, outdoor ethics principles such as Leave No Trace and Tread Lightly! and applicable restrictions and prohibitions.
8. Executing and administering cooperative agreements with climbing organizations and other cooperators regarding climbing opportunities in their administrative unit.
9. Monitoring the effects of climbing opportunities on NFS lands and their alignment with users' expectations, characteristics, and experiences.
10. When consistent with applicable law and directives, the applicable land management plan, and the applicable climbing management plan, issue and administer recreation special use permits to increase visitor climbing opportunities and enhance visitor education and awareness of low-impact climbing practices.

2355.04e – District Rangers

District Rangers are responsible for:

1. Having knowledge of climbing resources and past and current climbing trends and demand and anticipating future climbing trends and demand in their ranger district.
2. As funding and resources allow, developing climbing management plans for climbing opportunities in their ranger district for which a climbing management plan is required (FSM 2355.21), obtaining approval of the climbing management plans from their Forest Supervisor, and posting the climbing management plans on the website of their administrative unit.
3. When consistent with applicable law and directives, the applicable land management plan, and the applicable climbing management plan, issuing and administering recreation special use permits to increase visitor climbing opportunities and enhance visitor education and awareness of low-impact climbing practices.
4. Executing and administering cooperative agreements with climbing organizations and other cooperators regarding climbing opportunities in their ranger district.
5. Managing the Recreation Sites module of Natural Resource Manager (NRM) to allow Forest Service managers to track and maintain an inventory of climbing opportunities in their ranger district.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

2355.05 – Definitions

Climbing. A wide spectrum of techniques used to ascend, descend, or traverse technical rock and frozen terrain, including but not limited to bouldering, rock climbing, mountaineering, canyoneering, and ice climbing.

Climbing Opportunity. A user-created or primarily user-created dispersed recreation area on NFS lands with no, minimal, or limited Forest Service investment or amenities where climbing may be performed.

Fixed Anchor. Climbing equipment such as a bolt or piton that is left in place to facilitate ascent, descent, or traverse of technical terrain.

Fixed Equipment. Climbing equipment other than a fixed anchor that is left in place to facilitate climbing, such as a fixed line or ladder.

Motorized Drill. A device that uses a motor, engine, or other non-living power source to drill holes for the installation of fixed anchors or fixed equipment.

Sacred Site. Any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian Tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion, provided that the Tribe or appropriately authoritative representative of an Indian religion has informed the Forest Service of the existence of such a site (EO 13007, sec. 1).

2355.1 – Inherent Risk of Climbing on NFS Lands

Due to the inherent risk of climbing on NFS lands, the following should be included in climbing management plans (FSM 2355.21), posted on appropriate Forest Service external websites, and included in brochures and other materials that provide information to the public on climbing opportunities on NFS lands:

Climbing opportunities on NFS lands have inherent potential risks due to features or qualities of the land or environment, such as uneven or otherwise dangerous terrain; the risk of falling; risks associated with poor placement and lack of maintenance of fixed anchors and fixed equipment; risks associated with insufficient training, experience, or equipment; exposure to and effects of weather and wildfire; and the presence of insects, reptiles or wild animals, poisonous plants, hazard trees, flood plains, rock fall, landslides, and other aspects of the natural world. Individuals engaging in climbing at climbing opportunities on NFS lands assume these inherent risks.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

Climbing opportunities on NFS lands have a development scale of 0, 1, or, in rare cases, 2. Recreation opportunities at these low development scales are managed with an emphasis on resource protection and are typically characterized by uneven or natural terrain, little or no amenities, and no management of activities or site conditions. Accordingly, develop climbing management plans to address resource concerns associated with climbing opportunities on NFS lands, as opposed to visitor comfort. Climbing opportunities have greater inherent risks than developed recreation sites, which have a development scale of 3, 4, or 5 and are specifically designed, developed, and managed with an emphasis on visitor comfort.

2355.2 – Land Management Planning

Ensure that identified climbing opportunities are consistent with desired conditions, standards, and guidelines in the applicable land management plan. Consider climbing opportunities and associated climbing management plans in the context of sustainable recreation during land management plan development, revision, or amendment as described in the land management planning directives (36 CFR Part 219, FSM 1920, and FSH 1909.12).

2355.21 – Climbing Management Plan

As funding and resources allow, prepare a climbing management plan for climbing opportunities in Congressionally designated wilderness, and for climbing opportunities outside wilderness where the District Ranger determines that climbing is causing adverse resource impacts or use conflicts, and post the climbing management plan on the website of the applicable administrative unit. Prioritize the preparation of climbing management plans for wilderness or where adverse resource impacts or use conflicts are evident. Climbing management plans must be prepared in accordance with applicable law and directives and the applicable land management plan and with public input, including from user groups such as local climbing organizations. To achieve desired outcomes in a climbing management plan, evaluate the use of Forest Service resources versus leveraging funding or other forms of assistance through cooperative agreements with climbing organizations. A climbing management plan should:

1. Include management objectives, the area's desired Recreation Opportunity Spectrum settings (FSM 2310), and scenic character and scenic integrity objectives for climbing opportunities, including any associated facilities. Reduce visual impacts of climbing equipment to the extent possible.
2. Consider past, current, and anticipated climbing trends and demand.
3. Include associated educational and interpretive plans and materials that can be posted on a Forest Service external website and, as needed, published in hard copy to minimize adverse impacts, address management concerns, and promote natural and cultural

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

resource protection and outdoor ethics principles such as Leave No Trace and Tread Lightly!

4. Include techniques for managing climbing activities to avoid or alleviate adverse social and resource impacts. Manage climbing opportunities to the extent needed to accomplish management objectives.
5. Address access to climbing opportunities. Approach routes and any associated parking should be displayed on a map.
6. Include applicable recreation fee and special use authorization requirements.
7. Provide for monitoring of the associated climbing opportunity to assess the need to minimize adverse impacts and to enhance understanding of climbing trends and demand.
8. Include guidance on fixed anchor and fixed equipment placement and replacement by climbers. Consider adverse impacts on natural and cultural resources in providing guidance.
9. Include public safety, search and rescue, and other emergency procedures.
10. Include a strategy for managing human waste, trash, and graffiti. Specify disposal requirements and, where necessary, the type and placement of sanitation facilities and trash receptacles.
11. Address protection of natural and cultural resources.
12. Restrict or prohibit the placement or replacement of fixed anchors and fixed equipment in wilderness unless specifically authorized based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes (FSM 2355.32).
13. Include the full text in FSM 2355.1 concerning the inherent risk of climbing on NFS lands.
14. State that the Forest Service's national quality standards for developed recreation sites do not apply to climbing opportunities on NFS lands (FSM 2355.03, para. 10; FSH 2309.13, ch. 50) because they are classified at a development scale of 0, 1, or occasionally 2.

2355.3 – Climbing Management

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

1. Provide information on climbing management as an educational tool to reduce adverse impacts and optimize the visitor experience at climbing opportunities.
2. Coordinate with climbing organizations and members of the climbing community in implementing and obtaining compliance with restrictions and prohibitions on climbing.
3. As needed, seasonally restrict the use of climbing opportunities to protect threatened or endangered species, sensitive species, or species of conservation concern and their habitat. Where possible, use public education and interpretation and marked access to reduce or eliminate the need for closures.
4. Conduct law enforcement patrols at climbing opportunities as necessary to protect visitors and NFS resources.

2355.31 – Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment Outside Wilderness

1. Placement and replacement of fixed anchors and fixed equipment are appropriate outside wilderness where their placement and replacement are not restricted or prohibited in the applicable climbing management plan, and when they are placed or replaced in locations to reduce adverse resource impacts or to address safety concerns.
2. The placement and replacement of fixed anchors and fixed equipment must be consistent with any applicable climbing management plan, including requirements to reduce adverse resource impacts.
3. Restrict the placement and replacement of fixed anchors and fixed equipment to established climbing opportunities and to approved new climbing opportunities that have been evaluated for natural and cultural resource impacts. Allow placement and replacement of fixed anchors only for purposes of belay, rappel, traverse, resource protection, or aiding in ascent and descent. Do not allow extensive or arbitrary placement and replacement of fixed anchors and fixed equipment without regard to rock features that provide natural opportunities for ascent and descent, such as where fixed anchors and fixed equipment are placed or replaced at a location that is otherwise climbable purely to make the climb easier, as opposed to at a location that is not otherwise climbable to enable a climber's ascent and descent of a climbing route identified in the applicable climbing management plan.
4. Existing fixed anchors and fixed equipment may be used without restriction when consistent with the applicable climbing management plan, except in areas closed to climbing.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

5. Forest Service personnel are not responsible for placement, replacement, or maintenance of fixed anchors and fixed equipment or assessing or ensuring their safety.
6. Motorized rock drills may be used to the extent they are consistent with the applicable climbing management plan.
7. Analyze the placement and replacement of fixed anchors and fixed equipment to facilitate emergency operations and document the analysis and the decision based on the analysis.

2355.32 – Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness

1. Climbing, including the use of fixed anchors and fixed equipment, can fulfill important wilderness recreational purposes and can help preserve wilderness character by providing opportunities for primitive or unconfined recreation. Fixed anchors and fixed equipment are installations for purposes of section 4(c) of the Wilderness Act (16 U.S.C. 1133(c)). Therefore, a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination that the placement or replacement of fixed anchors or fixed equipment is the minimum necessary for administration of the area for Wilderness Act purposes, including primitive or unconfined recreation and preservation of wilderness character. Examples include allowing climbers to use fixed anchors and fixed equipment in wilderness at climbing opportunities that provide outstanding opportunities for primitive or unconfined recreation; directing climbers toward designated climbing opportunities with fixed anchors and fixed equipment to protect sensitive resources such as cultural resources or nesting bird habitat; and approving fixed anchors and fixed equipment in areas where impacts on the rock face are occurring due to the use of rock hammers to chip hand holds or foot holds into the rock.
2. Determine whether placement or replacement of fixed anchors and fixed equipment in wilderness is the minimum necessary for administration of the area for Wilderness Act purposes by conducting a Minimum Requirements Analysis. The determination must include an analysis of whether placement or replacement of fixed anchors and fixed equipment is the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. The determination must explain how and why the conclusions in the analysis were reached.
3. Document the Minimum Requirements Analysis and the determination based on the analysis.
4. Placement of new fixed anchors and fixed equipment in wilderness is allowed without prior authorization supported by a Minimum Requirements Analysis to respond to an

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

emergency involving public health or safety or other type of emergency such as a forest fire or other natural disaster (FSM 2355.03, para. 7). New fixed anchors and fixed equipment placed in wilderness in an emergency must be removed unless the Forest Supervisor determines that the fixed anchors and fixed equipment are consistent with the applicable climbing management plan and are determined to be the minimum necessary for administration of the area for Wilderness Act purposes, including primitive or unconfined recreation and preservation of wilderness character, or that removal of the fixed anchors and fixed equipment presents an unacceptable risk of injury, death, or wilderness resource damage. Document the decision to retain the fixed anchors and fixed equipment and the rationale for the decision.

5. Existing fixed anchors and fixed equipment in wilderness may be retained pending completion of a Minimum Requirements Analysis, as funding and resources allow, that determines they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. In the interim, emergency replacements of individual fixed anchors posing a legitimate safety concern may occur unless prescribed otherwise through an approved climbing management plan or equivalent planning document. Planned replacements must be evaluated and authorized through a Minimum Requirements Analysis. An updated Minimum Requirements Analysis should be completed if wilderness character conditions have changed since the original analysis, and/or if the drilling of a new hole is proposed.
6. A Forest Supervisor may propose removal of existing fixed anchors and fixed equipment in wilderness if they are no longer the minimum necessary for administration of the area for Wilderness Act purposes.
7. Prohibit use of motorized rock drills and practices such as chipping and use of glue, epoxy, or other fixatives for hand holds and foot holds in climbing management plans for climbing opportunities in wilderness.

2355.33 – Minimizing Impacts from Climbing Activities

1. Inform the public of threats to natural and cultural resources associated with climbing opportunities, such as wildlife habitat, nesting, or special considerations for vegetation and soils. Develop educational and interpretive plans that can be posted on an external Forest Service website and, as needed, published in hard copy to minimize adverse impacts, address management concerns, and promote resource protection and outdoor ethics principles such as Leave No Trace and Tread Lightly!
2. Taking into consideration input on management of climbing opportunities received during Tribal consultation, inform the public of ways to minimize or mitigate impacts on Tribal cultural resources such as Indian sacred sites.

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

3. Taking into consideration input received during consultation under section 106 of the NHPA, inform the public of ways to avoid or minimize impacts on historic properties, including but not limited to open-air archaeological sites, cliff dwellings, and rock art, that are listed on or are eligible for listing on the National Register of Historic Places.

2355.34 – Public Safety

1. Address public safety in connection with climbing at climbing opportunities on NFS lands through cooperation with climbing organizations, dissemination of information, public contact, and law enforcement.
2. As deemed feasible and appropriate by the responsible official, coordinate with the Forest and Regional Law Enforcement and Investigations staff in identifying and communicating public safety issues associated with climbing opportunities on NFS lands.
3. Coordinate with local law enforcement agencies and search and rescue organizations, as needed, when preparing search and rescue plans for climbing opportunities on NFS lands. Jointly publicize emergency contact information for climbing opportunities. Where appropriate, rely on local law enforcement agencies to conduct search and rescue missions for climbing opportunities on NFS lands.

2355.35 – Sanitation

Provide sanitation facilities at climbing opportunities consistent with the applicable climbing management plan and as deemed necessary by the responsible official for visitor health and resource protection. Appropriate sanitation facilities may range from various types of on-site toilets to a requirement for complete removal of human waste. If the applicable climbing management plan requires portable human waste bags, consider providing free bags at access points and a disposal area for used bags.

2355.36 – Trails

Approach routes for climbing opportunities may be considered for establishment as NFS trails if deemed necessary or appropriate by the local line officer, taking into consideration discretionary factors such as the importance to the climbing opportunity, permanency of the trail, and the ability to maintain the trail. Approach routes established as NFS trails must be identified, classified, documented, and inventoried consistent with FSM 2353.

2355.37 – Recreation Special Uses

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

When consistent with applicable law and directives, the applicable land management plan, and the applicable climbing management plan, issue and administer recreation special use permits to increase visitor climbing opportunities and enhance visitor education and awareness of low-impact climbing practices (FSM 2721.53; FSH 2709.14, ch. 50 and 80).

2355.38 – Compliance with Natural and Cultural Resource Laws

1. **National Environmental Policy Act (NEPA).** Depending on their content, climbing management plans may be subject to requirements of NEPA (36 CFR Part 220, FSM 1950, and FSH 1909.15) and other environmental laws. Climbing management plans that contain restrictions or prohibitions are more likely to require NEPA analysis than plans that provide only implementation guidance or technical information.
2. **NHPA.** Forest Service directives at FSM 2360 and FSH 2309.12 provide guidance on compliance with section 106 of the NHPA (54 U.S.C. 306108) and its implementing regulations (36 CFR Part 800). The Forest Service must consider the effects of all its undertakings on historic properties. A Federal undertaking is a “project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval” (36 CFR 800.16(y)). Climbing activities may affect historic properties. Heritage professionals and responsible officials should conduct a section 106 review, as applicable, in developing climbing management plans, including consulting with Tribes, State Historic Preservation Officers, and other interested parties, as early as possible in the development process.
3. **Tribal Relations.** Climbing opportunities may affect Tribal cultural resources such as Indian sacred sites. Forest Service directives on Tribal relations (FSM 1563 and FSH 1509.13) provide guidance on consultation with Native American Tribes and Alaska Native Corporations under EO 13175, *Consultation and Coordination with Indian Tribal Governments*, Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships, dated January 26, 2021, and EO 13007, *Indian Sacred Sites*.
4. **ARPA.** ARPA protects archaeological resources on NFS lands, including rock art and cliff dwellings, which can be damaged by climbing activities. Responsible officials should work with a heritage professional to inform the public about ARPA and the sensitive nature of archaeological resources on and near rock faces that may be affected by climbing activities.

2355.4 – Volunteers

Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management
Chapter 2350 – Trail, River, and Similar Recreation Opportunities

Encourage volunteer participation in projects such as planning for, mapping, and inventorying climbing opportunities. Promote climbing education through use of volunteer service agreements, memoranda of understanding, or agreements with volunteer organizations.

2355.5 – Research

Consistent with applicable regulations and directives, authorize research activities associated with climbing opportunities on NFS lands by qualified persons and institutions to increase knowledge and improve management of climbing opportunities on NFS lands, such as research that addresses ways to prevent long-term adverse impacts on those opportunities.