



November 16, 2023

Manti-La Sal National Forest
Attn: Plan Revision Team
599 West Price River Dr.
Price, UT 84501

Submitted via: CARA public comment portal

Re: Access Fund and Salt Lake Climbers Alliance Comments on the Manti-La Sal National Forest Draft Revised Forest Plan and DEIS

Dear Plan Revision Team,

Thank you for considering the following feedback from the Access Fund and Salt Lake Climbers Alliance Comments regarding the Manti-La Sal National Forest Draft Revised Forest Plan and Draft Environmental Impact Statement (DEIS). We recognize and genuinely appreciate the effort that the Manti-La Sal National Forest Planning Team has dedicated to the Draft Revised Forest Plan and welcome the opportunity to provide feedback.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund has over 20,000 members with more than 123 local affiliate climbing organizations including the Friends of Indian Creek who have long participated in planning, management and stewardship projects on the Manti-La Sal National Forest. Many of our members recreate on the Manti-La Sal National Forest and have strong interest in this plan revision. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach and we look forward to working with USFS planners to find the best management approach for the Manti-La

Sal National Forest. For more information about the Access Fund, visit www.accessfund.org.

The Salt Lake Climbers Alliance

The Salt Lake Climbers Alliance is a Utah climbing advocacy group whose mission is to engage as an advocate to protect outdoor climbing access and as a steward to maintain sustainable climbing resources in the Wasatch and surrounding areas. The Salt Lake Climbers Alliance is a 501c(3) nonprofit that serves over 20,000 climbers in the Wasatch Region. For more information about the Salt Lake Climbers Alliance, visit www.saltlakeclimbers.org.

Comments

The development of an updated forest plan for the Manti-La Sal National Forest is a complex project which will need to balance the needs of multiple communities and integrate lessons learned from past plans along with current conditions, U.S. Forest Service (USFS) policy, visitor use patterns, and public input. Access Fund and the Salt Lake Climbers Alliance (SLCA) provide the following comments to assist the USFS in developing a management plan that provides thoughtful management for the future of our public lands by supporting sustainable recreation opportunities while preserving the health and integrity of the surrounding cultural and natural resources.

Tribal Consultation

In striving to create the most effective, harmonious, and sustainable management plan possible, Access Fund will work alongside local Indigenous tribes who possess centuries of experience maintaining natural resources and moving across the land. Numerous archaeological sites and oral accounts provide ample evidence for the connection between traditional uses of the land and recreation. Whether climbing technical rock faces to access home sites and granaries, seasonally migrating between desert lowlands and alpine environments to herd livestock and find temperate weather, Indigenous people have been running trails, climbing rock, hunting and fishing, and summiting peaks long before the modern concept of outdoor recreation—and continue to do so today. As the original stewards, residents, and recreationists of the land, Tribes have approached its stewardship in a manner that understands both ecological processes and sacred values. Access Fund believes that these practices must be respected and prioritized in our modern era so that future generations of user groups continue to share the deep connection to the land we all so value.

Rock Climbing

Rock climbing is an important recreation activity on the Manti-La Sal National Forest, and is an appropriate and sustainable form of recreation on National Forest System lands. Approximately 37 percent of America's climbing resources (about 10,000 climbing sites) are managed by the USFS. The Manti-La Sal affords exceptional and diverse climbing opportunities, including Mill Creek, Dakota Crags, and Brumley Creek in the La Sal Mountains;¹ nationally-significant bouldering at Joe's Valley² near Castle Dale, Utah; and world famous sport climbing at Maple Canyon³ just west of Freedom, Utah. All of these climbing areas are highly significant resources for the climbing community and drive economic benefits to local communities. We recommend that the revised forest plan include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity and supports the use and maintenance of fixed climbing anchors as appropriate. In order to achieve this goal, the USFS should develop strategies for human waste management, resource protection, and erosion control and collaborate with local climbing organizations on education and stewardship initiatives.

Recommended Wilderness Management Area

A Recommended Wilderness Area (RWA) is a designation that protects undeveloped land with wilderness characteristics, and it also supports many human-powered recreation opportunities. However, many wild backcountry areas contain high-value mountain recreation such as climbing areas both with fixed anchors that may conflict with a wilderness designation. Access Fund and Salt Lake Climbers Alliance have provided detailed rock climbing site location information to the USFS during the 2017 Wilderness Evaluation Process. Our goal is to identify and resolve any potential conflicts, so that we can support appropriate RWA designations in the revised forest plan.

The USFS should work with recreationists to identify potential conflicts between non-conforming recreation uses and RWA designations early in the forest plan revision process to avoid creating or escalating conflicts. RWA boundaries should be drawn in a manner that minimizes effects to established recreation areas or uses. The current Recommended Wilderness in the central La Sal Mountains overlaps with the well-established climbing area called the Dakota Crags. The climbing area appears to

¹ See <https://www.mountainproject.com/area/110793944/la-sal-mountains>.

² See <https://www.mountainproject.com/area/105880382/joes-valley>.

³ See <https://www.mountainproject.com/area/105739298/maple-canyon>.

be right on the boundary line.⁴ We suggest that the boundary be adjusted to exclude the Dakota Crags from Recommended Wilderness. Existing bolt intensive climbing areas such as the Dakota Crags⁵ currently within Alternative B Recommended Wilderness in the central La Sal may not be compatible with a wilderness designation.

RWA, Plan Components suggested edits and additions:

Desired Conditions

- Wilderness areas maintain their existing\wilderness characteristics, the opportunity to preserve opportunities for inclusion in the National Wilderness Preservation System is preserved.
- System trails support wilderness experiences and preserve wilderness characteristics.

Standards

- Mineral or energy-related geophysical activity shall not occur in recommended wilderness areas.
- Commercial timber harvest or production shall not occur. Tree cutting may occur incidental to other management activities such as trail construction, trail maintenance, removal of hazard trees, or fireline construction.
- New roads shall not be constructed.
- New commercial communication sites shall not be allowed.

Guidelines

- Management activities utilize a minimal tool approach.

Objectives

- Eliminate five identified unauthorized motorized travel incursions per decade to maintain Wilderness character.

⁴ See Outdoor Alliance map found at

<https://outdooralliance.maps.arcgis.com/apps/webappviewer/index.html?id=ebb9961b38664dc2b6f2bae00aca9bf6>.

⁵ See <https://www.mountainproject.com/area/110793994/upper-dakota-crag/>

Suitability

- Not suitable for commercial timber activities.
- Not suitable for motorized travel.
- Not suitable for mineral leasing and sales.
- Recommended wilderness areas are suitable for low impact restoration activities that move toward desired conditions (such as prescribed fires, active weed management, planting) and that protect and enhance the wilderness characteristics of these areas.
- Not suitable for recreational and commercial drone launching and landings. Drone use may be allowed for administrative purposes or in approved research projects.
- Recommended wilderness areas are suitable for use of motorized tools (such as use of chain saws to clear trails) and mechanized transport to accomplish restoration activities.

Research Natural Areas

The Draft plan presents six Research Natural Areas (RNAs) within the Manti-La Sal. These RNAs have been identified to preserve representative areas that typify important forest, shrubland, grassland, alpine, other natural environments or areas that have special or unique characteristics of scientific importance. There are numerous existing recreational uses within these RNAs. Existing recreation that may not be compatible with the objectives for the RNA should be carefully surveyed to verify the extent of impact. Outreach to recreation user groups should be conducted to modify activities that may negatively impact the RNA while maintaining access when possible.

RNA, Plan Components suggested edits:

Standards

- DA-RNA-ST-01-To comply with the intent of research natural area designation, recreational use shall be managed to reduce impacts if such use is not compatible with the objectives for which the research natural area was designated.

Maple Canyon Climbing

Maple Canyon provides world class sport climbing opportunities. We support ongoing

stewardship of the area being shared with the climbing community to facilitate maintenance of fixed anchors, best practices for new route development, and climbing access trail improvements. Access Fund and SLCA have the resources and knowledge to assist and lead efforts in these areas of need and have an excellent relationship working with the USFS for many years in this capacity. We encourage the USFS to include language in the plan that explicitly allows for the use and maintenance of fixed anchors as appropriate in Maple Canyon.

Continued partnership between the Manti-La Sal NF and the SLCA is an asset to the climbers that visit Maple Canyon. The Manti-La Sal should invest in the climbing infrastructure such as but not limited to anchor, trail, and belay area maintenance. Fees collected from climbers in this area should go back to helping maintain recreation infrastructure at climbing areas.

Camping in Maple Canyon provides a tranquil experience for both local and visiting climbers. This camping experience is unique in the Western States where climbers can camp so close to their desired climbing locations. The camping and climbing experience are interwoven. Any changes to the current camping structure should involve input from the public.

The Manti-La Sal should implement a system to find reliable seasonal camp hosts. These hosts should be well versed in the different user groups of the canyon. The reliability of camp hosts enhance the camping experience, keep facilities clean, alleviate pressure on the National Forest Staff and reduce litter and damage to the canyon's resources.

The entrance to Maple Canyon has private land parcels that currently allow for recreation access including climbing in Box Canyon. This private land should be considered in the future planning for Maple Canyon and efforts made to partner with landowners. There is also potential for more parking and camping on these private parcels that could complement a forest plan.

Maple Canyon is a breeding territory for Golden Eagles. Climbing areas across the United States share habitat with cliff-nesting raptors including Golden Eagles. Seasonal monitoring is suggested to locate exact nest locations each season. Continued monitoring of the nest is suggested to assess the success or failure of the hatchlings, nestlings, chicks and fledglings. A viewshed analysis is suggested to adequately determine the climbing routes that would be affected by the seasonal closures. We encourage ongoing partnerships with Hawk Watch International, SLCA, and Access Fund to assist in monitoring and public outreach to promote avoidance areas. The

climbing community has a proven track record of respecting seasonal avoidance areas as well as assisting in collection monitoring data.^{6, 7}

Joe's Valley

Like Maple Canyon, Joe's Valley is also a world class destination, but for bouldering rather than sport climbing. The area has been through an extensive planning process with the USFS including an Environmental Assessment (EA) in 2017⁸ to aid in management of the area as a recreational resource. In addition, the SLCA compiled a detailed assessment of existing climbing resources and access paths including images and maps. This assessment was submitted to the Manti-La Sal National Forest in 2015. This assessment is available again upon request. This previous planning process included in-depth partnerships and feedback from SLCA, Access Fund and the Joe's Valley Coalition. We encourage the findings and management decisions of this EA to be incorporated as appropriate into this forest plan revision. Rock climbing has been a low impact recreation activity in the Price Ranger District for decades and the climbing community agrees with the continued use laid out in the DEIS.

We strongly support maintaining all existing dispersed camping along Cottonwood Creek Road #040 as well as along Highway 57 north of the BLM New Joe's Campground. Joes Valley Coalition looks forward to collaborating with the USFS to inventory the area for impacts as climbing increases in popularity and identify suitable areas for dispersed camping sites in order to maintain the existing number of available locations. By maintaining both dispersed and paid camping options in the region, the USFS will provide opportunities for users of different socioeconomic backgrounds to fully experience and enjoy the use of their public lands.

Mill Creek, Dakota Crags and Brumley Creek

Mill Creek, Dakota Crags and Brumley Creek in the La Sal Mountains offer stellar summer climbing opportunities. These areas are relatively close to Moab and offer high quality rock and cool temperatures during the hot summer season. These areas provide a mix of sport and traditional climbs and are a valuable recreational resource for climbers. We have provided location data for these areas in our collaborative map

⁶ See

<https://www.accessfund.org/news-and-events/news/climbers-partner-with-park-service-to-protect-zions-peregrine-falcons>.

⁷ See <https://www.accessfund.org/open-gate-blog/why-raptors-need-space>.

⁸ Joe's Valley Bouldering Area, Environmental Assessment. 2017
https://www.fs.usda.gov/nfs/11558/www/nepa/101516_FSPLT3_4032859.pdf

with Outdoor Alliance.⁹ Access Fund suggests that the USFS recognize these existing climbing areas including the use and maintenance of fixed anchors approved as appropriate. In addition we would like to partner with the Manti-La Sal National Forest to address any potential erosion issues and stabilize climber approach paths as necessary at these three La MSal Mountains climbing areas.

Justice, Equity, Diversity, and Inclusion (JEDI)

Access Fund urges the Forest to work with the local community to advance inclusive and equitable access to the Manti-La Sal National Forest. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area located in a diverse community, within driving distance to large metropolitan areas in Utah and Colorado. The Manti-La Sal should be accessible to people from a true diversity of backgrounds. We encourage the USFS to address environmental justice issues and make similar efforts to engage with communities of color and other underrepresented demographics. Access Fund has staff dedicated to JEDI issues, and is available to offer our time and resources to assist the USFS in applying JEDI principles to this Manti-La Sal National Forest Plan revision.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the Forest may require to provide for the outstanding opportunities found in the Manti-La Sal National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain¹⁰ climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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<https://outdooralliance.maps.arcgis.com/apps/webappviewer/index.html?id=ebb9961b38664dc2b6f2bae00aca9bf6>

¹⁰ See <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant> and <https://www.accessfund.org/pages/conservation-team>

Thank you for your consideration of these comments regarding the Manti-La Sal National Forest Draft Revised Forest Plan and Draft Environmental Impact Statement. Access Fund 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. Access Fund looks forward to continuing to work with the USFS. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 552-2843 or via email (katie@accessfund.org) to discuss this matter further.

Sincerely,



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Cc:

Erik Murdock-Access Fund, Interim Executive Director
Friends of Indian Creek
Joe's Valley Partnership