



February 12, 2018

Manti-La Sal National
Attn: Megan Eno
599 West Price River Drive
Price, UT 84501
Submitted via email: mlnfplanrevision@fs.fed.us

**RE: Access Fund and SLCA Comments on Manti-La Sal Forest Plan Revision –Evaluation
Process of Lands that may be Suitable for Inclusion in the National Wilderness
Preservation System**

Dear Planning Team,

The Access Fund and Salt Lake Climbers Alliance (SLCA) appreciate this opportunity to comment on the second phase of Manti-La Sal National Forest Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System (Evaluation). The Manti-La Sal National Forest holds many of Utah's premier rock climbing areas. These comments are intended to assist planners in the development of appropriate alternatives for wilderness recommendations that enhance and protect climbing access, while maintaining the wilderness character of the National Forests.

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) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 17,000 members and 117 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service¹ to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

¹ http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

Salt Lake Climbers Alliance

The Salt Lake Climbers Alliance is Utah's leading voice for climbing access and stewardship: uniting, educating, and inspiring climbers of all disciplines to serve their local climbing community since 2002. The SLCA exists to provide a unified voice for climbers in the Wasatch and surrounding regions through advocacy, stewardship, community, and education, visit www.saltlakeclimbers.org for more info.

COMMENTS

The Manti-La Sal National Forest contains a high concentration of established rock climbs in Utah. Each climbing area within the Forest is unique, and site specific considerations should determine the appropriate level of management. Because the Forest Service does not have a complete inventory of dispersed climbing areas and associated use-patterns, it is important that the Access Fund, and the SLCA, inform the Forest Service (e.g., through participation in this Forest Plan revision process) on the climbing resources so that longstanding climbing areas, access roads and trails are identified and appropriately managed and maintained. Furthermore, considering the lack of national-level Forest Service guidance on the use and placement of fixed anchors in wilderness (presumed to be issued through the forthcoming FSM 2320), and the fact that climbing occurs in wilderness and in inventoried wilderness, it is important the Forest Service is aware of the locations and best practices associated with rock climbing. Access Fund and SLCA submitted comments and provided ArcGIS shapefile data identifying existing climbing areas within the proposed Wilderness areas during the Inventory Phase in April, 2017². Our review of the shapefiles released by the Forest Service in the Evaluation phase in January 2018 show very little change to the proposed Wilderness areas released in 2017 in relation to existing climbing areas; we continue to have concerns regarding existing sport climbing areas being designated Wilderness under the new plan. These comments are intended to assist the Forest Service to ensure that climbing access is protected, and appropriate management prescriptions and designations will both maintain the health of the forest and enhance nationally-significant climbing opportunities.

Climbing in wilderness

Climbing is considered an appropriate wilderness activity³; however, not all types of climbing activities are suitable within designated wilderness areas. Fixed anchors⁴, although conditionally allowed in most Forest Service, Bureau of Land Management and National Park Service wilderness areas, can be problematic with regard to wilderness management⁵. Fixed anchors, defined by the Access Fund and the USDA Forest

² <https://www.accessfund.org/uploads/Manti-La-Sal-NF-Wilderness-Inventory-Comments-AccessFund-SLCA-2.pdf>

³ National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012 state that climbing is an appropriate wilderness activity. The USDA National Forest Service has yet to issue a national policy on wilderness climbing; however, climbing is allowed in most every national forest with climbing resources. There are approximately 7,000 climbing areas in national forest wilderness (source mountainproject.com).

⁴ https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf

⁵ National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012

Service⁶, as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established climbing routes thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in wilderness⁷.

Fixed anchors, specifically bolts, necessitate long-term maintenance⁸. Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently⁹. Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts¹⁰. Motorized drills are specifically prohibited in designated wilderness and often (but not necessarily) prohibited in recommended wilderness areas. Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Manti-La Sal National Forests wilderness inventory) depend on long term stewardship in order to maintain the established climbing routes and descents.

We believe that the well-developed and existing climbing areas in Manti-La Sal National Forest are "substantially noticeable"¹¹ "developed recreation sites"¹² and should thereby be excluded from wilderness recommendations in order to prevent undesirable future management issues. The reason why the developed climbing areas should be considered "substantially noticeable" is that the many climbing routes are dependent on fixed anchors, or bolts (permanent fixtures in the rock that are ~3/8" diameter and ~3" long), to provide climbers with a modicum of safety. The Forest Service Land Management Planning Handbook clearly states that "[a]s a general rule, developed sites should not be included [as wilderness]"¹³. The climbing areas highlighted in the following section of these comments are well-established and some were developed as early as the 1990's. These "developed recreation sites" are "substantially noticeable", and should not be included within recommended as wilderness in order to effectively maintain the exceptional climbing opportunities of today into the future.

⁶ Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>

⁷ Studies indicate that the vast minority of climbers (<20% based on site specific samples) have ever placed a bolt. It is reasonable to assume that an even smaller minority of climbers have placed a bolt (hand drilled) in a remote wilderness setting based on documented climber use-patterns.

⁸ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

⁹ *Ibid.*

¹⁰ <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

¹¹ The Wilderness Act states that wilderness "(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable . . ." (16 U.S.C. 1131c).

¹² Manti-La Sal National Forest Service Wilderness Process Phase 1: Inventory Preliminary Inventory Criteria

¹³ Forest Service Handbook 1909.12 – Land Management Planning Handbook, Section 71.22b, number 7.

Recommendations for Manti-La Sal National Forest

Manti-La Sal National Forest offers some spectacular sport climbing opportunities in Utah, drawing climbers from all over the United States and internationally. Many climbs were established in the 1990's and offer well- established bolted sport routes and the occasional traditional route with fixed anchors that warrant long-term maintenance. In addition these popular sport climbing areas include trails and climbing access paths which require ongoing maintenance and structures to provide sustainable access. The table below lists the location of the climbing areas and the associated Preliminary Wilderness Inventory Feature ID that we recommend be removed from the inventory or adjusted to exclude valuable climbing resources.

Moab Area/La Sal Area

Preliminary Wilderness Feature ID	Climbing Area	Coordinates		Climbing Type
52	Trenchtown/shanty town	Latitude	38.47028	Sport
		Longitude	-109.27448	
52	Exam Wall	Latitude	38.47264	Sport
		Longitude	-109.2832	
53	Ganja Wall	Latitude	38.47144	Sport
		Longitude	-109.27882	
52	High Valley	Latitude	38.44842	Sport
		Longitude	-109.22199	
52	Times Wall/KFC Area	Latitude	38.47229	Sport
		Longitude	-109.28207	
52	Ghostbuster Crag	Latitude	38.47171	Sport
		Longitude	-109.27949	
52	Mighty Re-arranger	Latitude	38.4716	Sport
		Longitude	-109.27892	

Maple Canyon

Preliminary Wilderness Feature ID	Climbing Area	Coordinates		Climbing Type
43	Fontera	Latitude	39.5551	Sport
		Longitude	-111.6795	
43	Early Bird Crag	Latitude	39.55575	Sport
		Longitude	-111.68189	
39	Engagement Alcove	Latitude	39.5545	Sport
		Longitude	-111.6881	

Preliminary Wilderness Feature ID	Climbing Area	Coordinates	Climbing Type
39	Orangutan Cove	Latitude 39.5538 Longitude -111.6885	Sport
39	The Matrix	Latitude 39.5572 Longitude -111.6916	Sport
39	The Great Chasm	Latitude 39.5569 Longitude -111.6902	Sport
39	Lou's Tavern	Latitude 39.55794 Longitude -111.68912	Sport
43	Willy Wall	Latitude 39.55955 Longitude -111.68685	Sport
39	Minimum Crag	Latitude 39.5622 Longitude -111.6906	Sport
39	Neversweat Wall	Latitude 39.56331 Longitude -111.69238	Sport
39	The Armory	Latitude 39.5616 Longitude -111.7014	Sport
39	Pipe Dream	Latitude 39.5657 Longitude -111.6964	Sport
43	School House Rock	Latitude 39.64935 Longitude -111.70181	Sport
39	Dizzy Rock	Latitude 39.556 Longitude -111.6875	Sport
39	Road Kill Rock	Latitude 39.5566 Longitude -111.6855	Sport
39	Billy the Kid Wall	Latitude 39.5557 Longitude -111.6869	Sport
39	Craggenmore	Latitude 39.5613 Longitude -111.6884	Sport
39	Shady Lane	Latitude 39.5613 Longitude -111.6893	Sport
39	Haji Rock	Latitude 39.5662 Longitude -111.6961	Sport
43	Maple Corridor	Latitude 39.5555 Longitude -111.6829	Sport
39	Bridge Area	Latitude 39.555 Longitude -111.6832	Sport
39	School Room Area	Latitude 39.5565 Longitude -111.6858	Sport
39	Rock Island	Latitude 39.5596 Longitude -111.6876	Sport
39	Eye of the World	Latitude 39.56177 Longitude -111.68797	Sport

Summary of Recommended Changes

Access Fund and SLCA recommend the Preliminary Wilderness Evaluation Areas (ArcGIS Feature ID's) **39, 43, 52** are adjusted to not include developed and well established sport climbing areas. Attached to these comments is a shapefile including locations of all climbs within the proposed Wilderness Evaluation area for ease of analysis by Forest Service staff. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to the climbing community. In addition these popular sport climbing areas include trails which require ongoing maintenance and structures to provide sustainable access trails. Climbing resources in Manti-La Sal National Forests provide the public with unique opportunities to experience primitive, human-powered recreation in beautiful settings. Longstanding, developed climbing areas within recommended wilderness invite future management issues that are avoidable. Preventing these types of issues is in alignment with the Forest Service's Sustainable Recreation framework, as well as its commitment to support appropriate forms of recreation such as rock climbing.

Access Fund and SLCA Assistance

The climbing community SLCA and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system, roads, and other management needs the Forest may require to provide for the climbing opportunities found in Manti-La Sal National Forest. SLCA and Access Fund are long time partners with the Forest Service and have conducted many Adopt a Crag events and stewardship initiatives in Maple Canyon dating back to 2002. Some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program¹⁴ or assistance from our Conservation Team¹⁵ which helps maintain 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.

*

*

*

¹⁴ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm

¹⁵ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Thank you for your consideration of these comments on potential wilderness recommendations. The Access Fund and SLCA have the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Forest. The Access Fund and SLCA look forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,



Katie Goodwin
Public Lands Associate, Access Fund



Julia Geisler
Executive Director, SLCA

Cc: Brady Robinson, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director