



April 27, 2017

Manti-La Sal National  
Attn: Megan Eno  
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Submitted via email: [mInflplanrevision@fs.fed.us](mailto:mInflplanrevision@fs.fed.us)

**RE: Access Fund and SLCA Comments on Manti-La Sal Forest Plan Revision – Inventory and 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) appreciates this opportunity to comment on the Manti-La Sal National Forest Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System (Inventory). 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 15,000 members and 100 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service<sup>1</sup> 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](http://www.accessfund.org).

**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](http://www.saltlakeclimbers.org) for more info.

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<sup>1</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration\\_with\\_federal\\_agencies.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm).

## 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. 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 activity<sup>2</sup>; however, not all types of climbing activities are suitable within designated wilderness areas. Fixed anchors<sup>3</sup>, although conditionally allowed in most Forest Service, Bureau of Land Management and National Park Service wilderness areas, can be problematic with regard to wilderness management<sup>4</sup>. Fixed anchors, defined by the Access Fund and the USDA Forest Service<sup>5</sup>, 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

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<sup>2</sup> 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).

<sup>3</sup> [https://www.accessfund.org/uploads/pdf/AF-AAC\\_FixedAnchorPolicy\\_20150428.pdf](https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf)

<sup>4</sup> National Park Service Directors Order #41, May 2013 and Bureau of Land Management Manual 6340 – Management of Designated Wilderness Areas, July 2012

<sup>5</sup> 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>

thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor in wilderness.<sup>6</sup>

Fixed anchors, specifically bolts, necessitate long-term maintenance<sup>7</sup>. 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 frequently<sup>8</sup>. Current best practices consider handheld, battery-powered, motorized drills to be the best tool for facilitating the safe replacement of antiquated bolts<sup>9</sup>. 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”<sup>10</sup> “developed recreation sites”<sup>11</sup> 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]”<sup>12</sup>. The climbing areas highlighted in the following section of these comments are well-established and some were developed as early as the 1990’s.

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<sup>6</sup> 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.

Schuster, R. M., Thomson, J. G., & Hammitt, W. E. (2001). Rock Climber's Attitudes Toward Management of Climbing and the Use of Bolts. *Environmental Management*, 28(3), 403-412.

Murdock, E.D. (2010). Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California (Unpublished). Doctoral Dissertation, University of Arizona.

Reighart, S. (2007). Rock Climber Perspectives on Management Issues in the Red River Gorge (Unpublished). Thesis, Ohio State University.

<sup>7</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

<sup>8</sup> Id.

<sup>9</sup> <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/best-practices-for-bolt-removal>

<sup>10</sup> 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).

<sup>11</sup> Manti-La Sal National Forest Service Wilderness Process Phase 1: Inventory Preliminary Inventory Criteria

<sup>12</sup> 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
120	The Confluence-Mill Creek	Latitude	38.49515	Sport
		Longitude	-109.31586	
11	Trenchtown/shanty town	Latitude	38.47028	Sport
		Longitude	-109.27448	
11	Exam Wall	Latitude	38.47264	Sport
		Longitude	-109.2832	
11	Ganja Wall	Latitude	38.47144	Sport
		Longitude	-109.27882	
11	High Valley	Latitude	38.44842	Sport
		Longitude	-109.22199	
11	Times Wall/KFC Area	Latitude	38.47229	Sport
		Longitude	-109.28207	
11	Ghostbuster Crag	Latitude	38.47171	Sport
		Longitude	-109.27949	
11	Mighty Re-arranger	Latitude	38.4716	Sport
		Longitude	-109.27892	

### Maple Canyon

Preliminary Wilderness Feature ID	Climbing Area	Coordinates		Climbing Type
38	Fontera	Latitude	39.5551	Sport
		Longitude	-111.6795	
38	Early Bird Crag	Latitude	39.55575	Sport
		Longitude	-111.68189	
34	Engagement Alcove	Latitude	39.5545	Sport
		Longitude	-111.6881	
34	Orangutan Cove	Latitude	39.5538	Sport
		Longitude	-111.6885	

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

## Summary of Recommended Changes

Access Fund and SLCA recommend the Preliminary Wilderness Inventory Area ID's **11, 34, 38, 120** are adjusted to not include developed and well established sport climbing areas. 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 Program<sup>13</sup> or assistance from our Conservation Team<sup>14</sup> 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.

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<sup>13</sup> [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm)

<sup>14</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation\\_Team.htm](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](mailto:katie@accessfund.org)) to discuss this matter further.

Best Regards,



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