



Protect America's Climbing



February 26, 2019

Salmon-Challis National Forest  
Attn: FPR/Wilderness  
1206 S. Challis Street  
Salmon, ID 83467  
Submitted via email: scnf\_plan\_rev@fs.fed.us

**RE: Access Fund and East Idaho Climbers Coalition Comments on Salmon-Challis 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 the East Idaho Climbers Coalition (EICC) appreciate this opportunity to comment on the Salmon-Challis National Forest Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System (Evaluation). The Salmon-Challis National Forest holds many of Idaho's premier rock climbing areas. These comments are intended to assist planners in the development of appropriate alternatives for wilderness recommendations that 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 20,000 members and 128 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).

**East Idaho Climbers Coalition**

The East Idaho Climbers Coalition advocates for climbers interests at major climbing areas in East/Southeast Idaho, including The Fins, Massacre Rocks, and CIRO/CRSP. The mission of EICC is to promote stewardship and climber education, to provide a united voice for access and user advocacy, and to improve climber safety through climbing hardware maintenance. EICC is active in fixed anchor replacement and maintenance at Pocatello's Ross Park and at Massacre Rocks. We

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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).

work closely with Idaho State University (ISU) Outdoor Program and the ISU Climbers Club to promote climbing and help sponsor local events like the Pocatello Pump and the 9 Lives Climbing Competition at ISU's Reed Gym climbing wall.

## COMMENTS

The Salmon-Challis National Forest contains several established rock climbing areas. 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, EICC and the climbing community, inform the Forest Service (e.g., through participation in this Forest Plan revision process) on the climbing resources so that long standing 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, 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 sometimes (but not necessarily) prohibited in recommended wilderness areas. Longstanding and developed climbing resources (such as the climbing areas that are located in the Salmon-Challis National Forests wilderness evaluation) 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 Salmon-Challis National Forest are “substantially noticeable”<sup>10</sup> developed recreation sites 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>11</sup> The climbing areas highlighted in the following section of these comments are well-established. 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.

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

## Recommendations for Salmon-Challis National Forest

Salmon-Challis National Forest offers some spectacular climbing opportunities in Idaho, drawing climbers from all across Idaho and across the country. Many climbs offer long established bolted sport routes and traditional routes with fixed anchors that warrant long-term maintenance. The table below lists the location of the climbing areas and the associated Wilderness Inventory Name that we recommend be removed from the inventory area.

### The Fins Climbing Area

Wilderness Inventory Name	Evaluation Focal Area	Climbing Site	Latitude	Longitude	# Routes	# Trad	# Sport
Howe Peak	No	American Beauty	43.72106	-113.07745	6	0	6
Howe Peak	No	Burning Spear	43.71993	-113.07671	4	0	4
Howe Peak	No	Classic Rock	43.71998	-113.07634	11	0	11
Howe Peak	No	Dark Side of the Moon	43.72128	-113.07766	8	0	8
Howe Peak	No	Jet A Sector	43.72721	-113.08171	11	0	11
Howe Peak	No	Martini Sector	43.72721	-113.08171	17	0	17
Howe Peak	No	Mothership Sector	43.72721	-113.08171	8	0	8
Howe Peak	No	Psychedelic Rock	43.7201	-113.07682	19	0	19
Howe Peak	No	Rock of Ages	43.72066	-113.07721	12	0	12
Howe Peak	No	Sea of Joy	43.72124	-113.07766	7	0	7
Howe Peak	No	Solstice	43.73145	-113.08445	5	0	5
Howe Peak	No	Stone Temple	43.72201	-113.07766	6	0	6
Howe Peak	No	The 56 Wall	43.72956	-113.08335	3	0	3
Howe Peak	No	The Head Wall	43.73145	-113.08445	24	0	24
Howe Peak	No	The Watchtower	43.7208	-113.07735	2	0	2
Howe Peak	No	Warm up Wall	43.73145	-113.08445	3	0	3
Howe Peak	No	X-Crack Crag	43.72245	-113.07709	3	0	3
Howe Peak	No	Yellow Cake	43.73145	-113.08445	6	0	6
Howe Peak	No	Gateway Rock	43.72100	-113.07600	7	0	7
Howe Peak	No	Rolling Stone	43.72100	-113.07700	6	0	6

Howe Peak	No	Wonder Wall	43.72200	-113.07800	9	0	9
<b>Other Climbing Areas</b>							
South Cabin Creek Peak	Yes	Yankee Fork Crag	44.28391	-114.7273	9	2	7
Borah Plus	Yes	GFC Wall	44.1227	-113.80916	1	0	1
Borah Plus	Yes	Main Wall	44.12278	-113.80789	3	0	3
Borah Plus	Yes	Mt Idaho	44.1054	-113.7763	1	1	0
Borah Plus	Yes	Mt. Borah	44.13762	-113.78038	3	3	0
Borah Plus	Yes	Via Ferrata Wall	44.12278	-113.80835	1	0	1
Borah Plus	Yes	Pass Creek Canyon	43.95100	-113.44500	10	0	10
Borah Plus	Yes	Ramshorn	43.83773	-113.28740	5	0	5
Borah Plus	Yes	Bear Creek	43.98900	-113.49400	44	29	15

### Summary of Recommended Changes

Access Fund and EICC recommend the Wilderness Evaluation Areas, South Cabin Creek Peak, Howe Peak and Borah Plus are carefully reviewed and adjusted to not include developed and well established climbing areas listed in the above table. The ability to safely replace and maintain fixed anchors on established climbing routes is paramount to the climbing community. Climbing resources in Salmon-Challis 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 conflicts that are avoidable. Preventing these types of issues is in alignment with the Forest Service Sustainable Recreation framework, as well as its commitment to support appropriate forms of recreation such as rock climbing.

### Access Fund and EICC Assistance

The Access Fund, EICC and the climbing community 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 Salmon-Challis National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program<sup>12</sup> or assistance from our Conservation Team<sup>13</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>12</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>13</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 has 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 looks 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,

A handwritten signature in black ink that reads "Katie Goodwin". The signature is written in a cursive style with a large, prominent "K" and "G".

Katie Goodwin  
Policy Analyst, Access Fund

A handwritten signature in black ink that reads "Mike Engle". The signature is written in a cursive style with a large, prominent "M" and "E".

Mike Engle  
President, East Idaho Climber Coalition

Cc: Chris Winter, Access Fund, Executive Director  
Erik Murdock, Access Fund, Policy Director

