



April 27, 2017

BLM, Price Field Office
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Submitted via email: blm_ut_pr_recreation@blm.gov

RE: Environmental Assessment-Joe's Valley Bouldering Area

The Salt Lake Climbers Alliance (SLCA) and the Access Fund appreciate the opportunity to comment on the Environmental Assessment (EA) for Joe's Valley Bouldering Area. Joe's Valley bouldering is considered some of the best in the world. Its high concentration of boulders, impressive number of moderate and advanced climbs, relatively easy access and aesthetic surroundings attract climbers from around the world. Joe's Valley is a hugely popular area, quick access from the Wasatch Front of Utah and the Front Range of Colorado make it a frequent destination for those on long road trips or day trips. The EA proposes four alternatives to manage this area moving forward; the SLCA and the Access Fund support alternative C with one modification: the addition of designated dispersed campsites.

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.

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 and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 15,000 members and over 100 local affiliates. 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.

Comments

After careful review of the four proposed alternatives SLCA and Access Fund support alternative C with the addition of several designated dispersed camp sites. Below are our comments regarding camping, parking, fees, human waste, and trail and staging area development.

Camping

The SLCA and Access Fund are supportive of creating camping opportunities that not only provide acceptable environmental and visitor protections, but also provide an enjoyable recreational experience for climbers and non-climbers alike. Part of the recreational experience of Joe's Valley is that the area has a feel of undeveloped open space. We support alternative C which provides a combination of a developed campground at New Joe's (Grimes Wash), and allows for dispersed camping (except in Straight Canyon). Camping and parking infrastructure modifications should be as minimal as possible to keep user fees low and maintain the recreational experience of Joe's Valley.

Dispersed camping is an important component of the visitor's experience at Joe's Valley and should remain as a camping option. We encourage the BLM to designate several dispersed sites with delineated parking and camping footprint within the Right Fork on BLM land. The designation of select dispersed sites would alleviate conflict with grazing operations, other user groups, and be utilized by the climbing community. The SLCA and Access Fund welcome the opportunity to conduct a site visit with the BLM and USFS to determine which dispersed sites should be designated and which should be restored. Referencing the "Joe's Valley Bouldering Area Recreation Site, Informal Trail, and Dispersed Campsite Impact Baseline Assessment" map (link to map: <http://bit.ly/1r4dWW1>) will aid this decision-making process.

Roadside Parking Management

The SLCA and Access Fund support the closure of overnight camping in Straight Canyon. We support the improvements and additions of the eight new parking areas on BLM land in addition to the 28 existing parking areas located on USFS-administered land.

Designated Day-Use Parking Areas

Day-use parking needs to accommodate the number of recreationalists currently parking along the roadside at peak times. Day-use parking should be clearly signed and rules enforced. Overnight parking should not be allowed in day-use parking spots.

Fees

The SLCA and Access Fund believe that if it is determined that use fees must be collected, then these fees should be specifically directed back to the resources at which they are collected (i.e., camping fees must cover the cost of toilet and facility maintenance).¹ We encourage the development of all amenities be kept at a minimum to reduce fees and

¹ BLM Manual 2930, Planning and Renewal, Recreation Permits and Fees - 43 CFR Part 2930

maintain a sense of undeveloped camping experience, while also maintaining a balance of resource protection. We support established parking, fire pits, and picnic tables within the campground and at designated dispersed sites.

Human Waste

SLCA and Access Fund support the proposed toilet installations under alternative C, the toilets should be sufficient to create a healthy experience in Joe's Valley in addition to protecting the local watershed. The SLCA took initial steps in attempting to curtail the concerns of human waste in Joe's Valley by installing two seasonal port-a-pots in the area. Since being placed nine years ago, these are now over run by visitor use and are costing the SLCA upwards of \$2,500/yr. We strongly support pit toilets in both the Cottonwood Canyon and Straight Canyon. Toilet design and implementation should be kept as basic as possible while supporting use levels to insure reduced fees and maintenance costs. We encourage the BLM to partner with Access Fund and SLCA to develop kiosk information at both pit toilets.

Climbing Access Trails and Staging Area Development

SLCA and Access Fund support the trail and bouldering site enhancements proposed under alternative C with the exception of proposed closures of boulders related to sensitive plant species. All management tools should be used to allow boulders to remain open, especially if the soil is already impacted and no *Hedysarum occidentale* v. *canone* (Canyon sweetvetch) is present. Fencing surrounding boulders near sensitive plants and along the approach trail should be installed with "dogs on leash" signs installed in this zone to protect the Canyon sweetvetch. Access Fund and SLCA will work with the BLM and USFS to pursue other management strategies such as trail re-routes and strategic fencing to avoid complete closure of an area. We request notification from the BLM and USFS be given to Access Fund and SLCA regarding any potential closures of boulders, so we can assist in alternative management options to avoid closure of an area.

We strongly support trail hardening, re-routing, and monitoring of soil conditions at all class 4-5 sites, and encourage a staged work approach for class sites 1-5 to address future growth and need for recreation infrastructure. Creating sustainable and structurally sound use areas (pad platforms) and approach paths for climbing areas will provide longevity to the climbing resources and encourage continued use. The climbing community can be relied upon for much of the stewardship of this area, through volunteer Adopt a Crag events. Currently Access Fund and SLCA host two Adopt a Crag events a year, and plan to continue this work in the future. Invasive species removal and native plant rehabilitation should be added to the list of actions in this EA.

Conclusion

The SLCA and the Access Fund would again like to express our gratitude to the Price BLM for conducting the EA. The completion of this EA will create tangible benefits to rock climbers and other recreation users, while protecting the resource. SLCA and Access Fund support alternative C with one modification: the addition of designated dispersed campsites in several areas. We encourage the development of all amenities be kept at a minimum to reduce fees and maintain a balance of resource protection and a sense of an

un-developed camping experience. The SLCA and Access Fund respectfully request that the comments made in this letter are adopted the Final EA and the Record of Decision to implement the best sustainable management strategies for Joe's Valley bouldering area management.

SLCA and Access Fund Support

The climbing community SLCA and the Access Fund are ready, willing, and able to help the BLM and USFS implement alternative C with the addition of several designated dispersed campsites. The Access Fund has secured a Utah State Office Outdoor Recreation Grant to conduct future stewardship work in partnership with USFS and BLM at Joe's Valley. SLCA and Access Fund have a long history of positive environmental stewardship and collaboration with the BLM and USFS at Joe's Valley Bouldering Area. We also provide training on planning and stewardship best practices to keep those areas healthy. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program² or assistance from our Conservation Team³ which helps maintain climbing areas throughout the United States.

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Thank you for your consideration of our comments on the Environmental Assessment for Joe's Valley Bouldering Area. SLCA and Access Fund look forward to continuing to work with the BLM and USFS. Please keep us informed as the planning process proceeds. We request a Joes Valley Coalition meeting be scheduled in the near future to discuss potential dispersed camping sites and future work. Finally, we truly appreciate the efforts of the staff to seek input from the climbing community. If you or your staff have any questions in regards to the comments raised in this letter, please do not hesitate to contact the SLCA and Access Fund for clarification. Lastly, please let the SLCA and Access Fund know whether we can assist your staff in anyway in finalizing the EA.

Kindest Regards,



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² See http://www.accessfund.org/site/c.tmL5KhNWLRH/b.5000903/k.9722/Grants_program.htm.

³ See http://www.accessfund.org/site/c.tmL5KhNWLRH/b.7653393/k.AEEB/Conservation_Team.htm.