

November 23, 2021

Attn: Sam Staley, Forest Planner GMUG Forest Plan Revision Team 2250 South Main St Delta, CO 81416 Submitted Via online comment form and via email: samantha.j.staley@usda.gov

Re: Gunnison Valley Climbers Comments on Draft Forest Plan for the Grand Mesa, Uncompany and Gunnison National Forests

Dear Plan Revision Team:

Thank you for the opportunity to provide comments on the Draft Forest Management Plan for the Grand Mesa, Uncompany and Gunnison National Forests (GMUG). The mission of Gunnison Valley Climbers (GVC) is to steward the Gunnison Valley's climbing resources while adhering to the ethics established by the area's pioneers. As the Forest Service plans the future of this important national forest, GVC is writing to urge you to strengthen the Draft GMUG Forest Plan as it pertains to rock climbing. Consistent with our mission, GVC's comments focus on recreational needs surrounding rock climbing including trails, access, and hardware.

Introduction

Rock climbing has been an activity and use of the land on the GMUG for over 50 years dating back to the 1970s. Since then, climbers have established a wide variety of climbing opportunities, including world-class routes and areas for new and seasoned climbers alike. Rock climbing is minimally mentioned and not thoroughly discussed in the Draft Plan and GVC would like to urge the planning team to take the following into consideration:

Trail Maintenance and Access

Climber use is increasing on the GMUG. Continued use without foresight and planning for future impacts could negatively affect climbing resources and the surrounding environment. The Draft Plan should better address climber access as it pertains to trails, parking and other facilities to provide a positive user experience and to mitigate negative impacts to climbing resources and the surrounding environment.

GVC supports desired condition FW-DC-TRLS-01 which supports the creation and maintenance of a sustainable, diverse trail system on the GMUG. However, the current plan does not include

meaningful objectives, standards, or management approaches addressing climber access or user experience.

GVC recommends the following objective be added to the Forest Plan:

FW-OBJ-TRLS-03: Every ten years following the adoption of the plan, trails used primarily for access to other recreational opportunities (rock climbing, fishing, etc.) will be inventoried and prioritized for incorporation into the National Forest System of trails.

Fixed Hardware

The placement of permanent protection bolts and anchors are a necessary component of rock climbing for ascending and descending a climbing route. Bolts are common practice on many other national forests and are needed for safety purposes and to provide a certain climbing experience. Over time these protection bolts and anchors become corroded and ultimately deemed unsafe. Trained individuals often replace these bolts with new, modern hardware to keep climbing routes safe. The Draft Plan should consider the use of fixed hardware as necessary and legitimate for rock climbing on the GMUG and its associated wilderness areas.

To accommodate this, GVC would like to see the following desired condition added to the Forest Plan:

FW-DC-INFR-03: Permanent protection bolts and anchors needed for safety and particular climbing experiences are installed or maintained

Partnerships

The agency can foster strong partnerships and cooperation between Forest Service employees, GVC, local climbers and other local climbing organizations (LCO). There are hundreds of LCOs around the country that work in cooperation with land managers to care and steward their local climbing resources. The same can be done here and will prove to be beneficial for all entities involved. In these tight-budgeted times, LCOs can provide the help and assistance necessary to care for climbing resources without adding more responsibility to the agency's staff. MOUs can be agreed upon to give the local climbing community the autonomy to steward their respective area, up to agency standards, but not to burden agency staff.

Thank you for your time and consideration. We appreciate the opportunity to provide comments on this Draft Plan.

Sincerely, Gunnison Valley Climbers