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Subject: Comments on Fixed Anchor Guidance

- FSM 2355 Climbing Opportunities #ORMS-3524
- Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas

Dear Agency Representatives:

The Salt Lake Climbers Alliance appreciates the opportunity to comment on both the National Park Service's and Forest Service's draft guidance regarding fixed anchors.

First and foremost, **we strongly oppose the classification that fixed anchors are prohibited installations under the Wilderness Act and believe that any such language should be omitted from the final guidance.**

The Salt Lake Climbers Alliance is a 501c(3) nonprofit that formed in 2002 at the behest of the Forest Service and serves over 20,000 climbers. Our goal is to engage as an advocate to protect outdoor climbing access and as a steward to maintain sustainable climbing resources in the Wasatch and surrounding regions. **We employ professional technicians to replace and maintain fixed anchors in partnership with public and private land managers.** Since 2021, the SLCA has invested over $275k into anchor maintenance in the Uinta-Wasatch-Cache and Manti-La Sal National Forests.

Like all professional groups performing work on federal land, we hold insurance, workers compensation, provide work-at-height training and continuing education, and complete a job hazard analysis per job. We have authored a series of publicly available professional manuals relating to workers safety, work-at-height, and best practices quality control that have been adopted and shared across the nation by local and national climbing organizations. Our staff are professionally trained in this skilled craft, just like some of our nations' finest trail builders. Our track record has proven that this programmatic model works for the land agencies, the community, climbing nonprofits, and the workers that perform this specialized work.

Climbing has been a recognized and celebrated form of recreation allowed on public lands for over 125 years. Fixed anchors are an essential and necessary piece of a climbers' safety system and must not be prohibited under this new guidance. **The Salt Lake Climbers Alliance contends that maintaining existing climbing resources, including those located within wilderness, is a matter of public safety and is necessary for providing for one of the foundational purposes of federally designated wilderness: recreation. The national directives should allow for anchors to be placed and maintained for the safety of the general public when climbing without requiring a Minimum Requirements Analysis (MRA).** As explained further below, the directives' requirement that an MRA be completed before allowing existing fixed anchors to be placed, replaced, or maintained in wilderness may result in hundreds of routes within northern Utah having unsafe fixed anchors and posing an unacceptable risk to the climbing public.

Land management agencies already have the ability to regulate fixed anchors to protect natural resources under their Organic Acts. This new proposed guidance will create undue burdens on these agencies and their partners. The agencies should move away from their argument that fixed anchors are installations under Section 4c of the Wilderness Act, and towards common sense national climbing directives that focus on protecting wilderness character and providing for primitive and unconfined recreation. **Placement, use, and maintenance of fixed anchors are appropriate and necessary for climbing, regardless of the land designation.** The agencies have full authority to regulate these activities without resorting to the draconian position that all fixed anchors are prohibited in wilderness unless authorized through an MRA.

The agencies have limited resources, both in staff and funding, for which processing MRAs would depend, making these proposals even more impractical. This process would be further stymied if the responsibility to conduct MRAs is divided amongst a District Ranger and a Forest Supervisor as proposed. Furthermore, the subjective nature of an MRA allows for varied interpretation on fixed anchors and is not a clear policy directive.

The unworkability of the MRA method for all fixed anchors is also underscored by the agencies' associated procedural requirements for authorization. The National Park Service directives make clear that a special use permit will be required to place or replace fixed anchors and, although less clear, it appears a similar permit will have to be issued for the Forest Service. As federal actions, permitting will require compliance with the National Environmental Policy Act, National Historic Preservation Act, Archeological Resources Protection Act, Endangered Species Act, tribal consultation requirements, and others. The agencies also require climbing management plans, or functional

equivalent, to be in place before any fixed anchor permitting actions may proceed—these climbing plans are very rare, complicated, costly, and will require years to complete, if ever. While the conditions and situations at particular National Park Service and Forest Service units may warrant significant climbing area planning and permitting requirements, imposing such requirements across all units nationwide is as unjustified as it is unworkable. Especially with the lack of resources from the federal government issued to local Forest Service Districts to complete this directive.

The goal of protecting and preserving natural landscapes in wilderness will suffer if the agencies require a blanket MRA/permitting bureaucracy. Instead, the National Park Service and Forest Service should preserve the existing authority outlined in National Park Service Director's Order 41 for local land management agencies to regulate climbing to ensure it protects wilderness character, natural resources, and cultural values—and provides a means for public participation in decisions impacting climbing in wilderness.

Utah, as well as much of the Western United States, is blessed with world-class rock climbing. **From roadside crags to alpine summits, some of Utah's climbing exists within, and predates, the wilderness designations.** With an exponentially growing climbing community, people will continue to climb these established routes for years to come.

Case Studies

With over two decades of partnering with the U.S Forest Service to replace and maintain fixed anchors, we would like to share two case studies where the national agencies' draft policies would **severely undermine successful fixed-anchor management programs** in the Uinta-Wasatch-Cache National Forest. The first case study is in Little Cottonwood Canyon and the second in American Fork Canyon; both highly important culturally and popular climbing areas in the Forest Service-managed lands.

The Uinta-Wasatch-Cache National Forest sees more visitors than all of Utah's "Mighty Five" National Parks combined, which is approximately nine million visitors annually. The access to recreation in this forest, including climbing, is located within minutes of the Wasatch Front metropolis of over 2.5 million people. Many of our designated wilderness areas are therefore front-country areas that are in real need of stewardship and maintenance.

Along with Little Cottonwood and American Fork Canyon, the list of established rock climbing destinations located within the Uinta-Wasatch-Cache National Forest

wilderness areas, most of which are in view of the Wasatch front's urban interface, includes Big Cottonwood Canyon, Ferguson Canyon, Bells Canyon, the Uinta Mountains, and more. All told, based on publicly sourced route data from Mountain Project, it is estimated that twenty percent of climbing in this Forest is within wilderness. This estimate is pulled from 2019 data, and that estimate is likely higher than twenty percent. **That's hundreds of long-established front-country routes with hundreds of necessary fixed anchors that have been around for decades**, much of which are made up of non-stainless hardware that, if not replaced, will corrode, rust, and fail under human weight. These routes can not wait for an MRA to be conducted on them for maintenance to occur. Public safety is at risk.

Case Study: Little Cottonwood Canyon

Little Cottonwood Canyon (LCC) is one of the premier climbing areas in the Western United States. There are over one thousand climbing routes in LCC, the vast majority of which have some type of fixed anchor. Many of these routes are within wilderness.

Within LCC is the **Little Cottonwood Canyon Climbing Area Historic Site,** which has been determined eligible for the National Register of Historic Places (NRHP). The Historic Site includes routes that were established in the 1960s by the renowned Alpenbock Club and are reliant on fixed anchors. These routes are both inside and outside of the Twin Peaks and Mount Olympus wilderness, which was designated in 1984. Once LCC is listed on the NRHP, it will be posted in the National Register database and in the Library of Congress. The Little Cottonwood Canyon Climbing Area Historic Site holds statewide significance as an excellent representation of a culturally significant site in the areas of recreation and social history in Salt Lake County. Wilderness character recognizes the significance and gives weight to cultural and spiritual attributes, which this area clearly has.

Thousands of people every year climb the routes within LCC and within this Historic Site. Little Cottonwood Canyon has, in fact, become a training ground for Olympians, like Utah native silver medalist, Nathanial Coleman, as well as USA Climbing athletes. All climbers, regardless of race, ethnicity, religion, social class, gender identity, gender expression, sexuality, ability, or age, enjoy the connection to nature and sport that this area provides, and deserve to have well maintained climbing areas.

If the Forest Service were to adopt the legal position that a fixed anchor is a prohibited "installation" under the Wilderness Act and require MRAs for every route, it will upset the good working relationship we have with the Forest Supervisor and local District Ranger in replacing the unsafe and aged fixed anchors in LCC. SLCA, in cooperation with the local Forest Service officials, has

replaced hundreds of fixed anchors in LCC, and there are many more that need replacing and ongoing maintenance both within and outside of wilderness. The legal position that a fixed anchor is prohibited in wilderness will upset the foundation of Uinta-Wasatch-Cache National Forest Plan which does not prohibit fixed anchor replacement anywhere within the Forest. To complicate matters further, wilderness boundaries are not clearly marked on the Forest and oftentimes one crag or cliff band will straddle a wilderness boundary. Two different management prescriptions for the same climbing area is confusing for the user as well as for the agency and partners working to steward the resource.

Based on our years of experience in working with the Forest Service, we know that the agency has both insufficient personnel and funding to timely conduct the MRA/permitting requirements that would be imposed by the draft Forest Service directive for every route in wilderness. This will result in many currently unsafe routes remaining in that condition and many more with aging fixed anchors that will pose unacceptable risk to thousands of climbers. The fact that the Forest Service has caused this situation by taking a needless hardline legal position can also be expected to strain our relationship in replacing unsafe fixed anchors in non-wilderness as perceptions shift among the public about the appropriate role of the Forest Service in managing fixed anchor use.

In short, the Forest Service's position would extremely restrict the ability to replace unsafe and dangerously old anchors on routes that have existed in LCC and, indeed, have been celebrated by the Forest Service for many decades, and create an unacceptable risk on many routes within minutes of the rapidly growing metropolis of the Wasatch Front.

Case Study Two: American Fork Canyon

The climbing routes in American Fork Canyon, both within designated wilderness and non-wilderness, are extremely popular because they are near the densely-populated Wasatch Front. The climbing areas have relatively short approaches from parking areas, provide shade throughout the day, and there is a wide variety of difficulty levels that can accommodate beginners and expert climbers.

The rock in American Fork Canyon is not conducive to removable anchors, like traditional camalots and nuts, and fixed anchors are required for this style of limestone rock climbing. Hundreds of fixed anchors in American Fork Canyon were originally placed 25-35 years ago, with the knowledge of the agency, and are in need of replacement and maintenance. Most of the hardware in American Fork Canyon is inferior to modern hardware, has degraded over time, and needs replacement with

modern stainless steel hardware to ensure safety and long-term sustainability. The climbing industry's understanding of metallurgy, mechanics, and environmental conditions has evolved considerably over the past few decades and has resulted in the availability of safer, long-lasting fixed hardware. Anchors within the Lone Peak Wilderness have not been replaced in deference to the Forest Service's wishes pending guidance from the Washington Office. **As the anchors continue to age, widespread replacement and maintenance is necessary to protect the safety of the public partaking in rock climbing in American Fork Canyon. This stewardship should not be hindered by subjective MRAs and climbing management plans that will take years to develop—maybe never.** Thousands of climbers depend on these anchors for their safety *every year.* American Fork is a fee based canyon that has collected fees from climbers for decades. Climbers have had the understanding that fixed anchor dependent climbing is a legitimate use of the Forest.

The agency has already demonstrated that it does have the resources to timely authorize fixed anchor replacement and maintenance with MRAs. We asked the Forest Service for authorization to use a power drill to replace dangerous fixed anchors in American Fork in 2017, assuming then, based on Forest Service practice, that fixed anchors were not prohibited "installations." The Forest Service then was to analyze only whether using a power drill would meet the minimum tool standard, which we recognized was appropriate and willingly provided the Forest Service with any information requested. The Forest Service has yet to complete that process and it is still in the works on a MRA seven years later.

In sum, we have no reason to believe that the agency can timely undertake an MRA/permitting process for fixed anchor replacement in either LCC or American Fork Canyon, much less that the agency would be able to accomplish MRAs for every route and anchor nationwide. Meanwhile, these anchors will continue to age without replacement of maintenance and eventually start to fail under human weight. The directives from Washington should help the local Districts with sustainable climbing management instead of making their jobs even more cumbersome by dictating that fixed anchors are prohibited and by requiring a MRA/permitting process for all routes.

<u>Our Recommendation</u>

We respectfully request that the agencies issue better, common sense directives that utilize location specific Climbing Management Plans. Resources and personnel need to be dedicated from the agency to craft Climbing Management Plans. The proposal to declare fixed anchors as prohibited "installations" under the Wilderness Act is unwarranted. Existing management constructs, such as cost share or volunteer agreements, between the agency and climbing organizations adept at anchor

maintenance and climbing area stewardship, should further enhance high quality recreation with sustainable, publicly sourced funding support. We urge the federal agencies to further working partnerships to steward our natural landscapes instead of the inverse of this new policy directive. The Salt Lake Climbers Alliance is available to contribute to this policy and partner on subsequent Climbing Management Plans as they unfolds.

Sincerely,
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