



State of Utah

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## Department of Natural Resources

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### Public Lands Policy Coordinating Office

REDGE B. JOHNSON  
*Director*

January 30, 2024

*Submitted electronically:* <https://cara.fs2c.usda.gov/Public/CommentInput?project=ORMS-3524>

Gregory Smith  
Associate Deputy Chief  
National Forest System  
United States Forest Service  
United States Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

**Subject: Forest Service Manual 2300—Chapter 2350, Section 2355 Climbing Opportunities**

Dear Associate Deputy Chief Smith:

Utah is the proud home of some of the world's premier rock-climbing locations, many of which are located within U.S. Forest Service ("USFS") designated wilderness areas. Rock climbing on USFS lands is a cherished activity for many of Utah's residents and visitors, and the Utah State Government has a keen interest in promoting the safety and growth of rock-climbing activities within Utah. The Utah Division of Outdoor Recreation's Outdoor Recreation Grant and Recreation Restoration Infrastructure Grant programs regularly support the maintenance of fixed anchors on USFS lands, primarily within the Uintah-Wasatch-Cache National Forest, but also within the Maple Canyon area of the Manti-La Sal National Forest. Indeed, over the last three years, the Utah Division of Outdoor Recreation has contributed approximately \$140,000 to anchor maintenance on USFS lands. Community organizations in Utah, such as the Salt Lake Climbers Alliance, have also made tremendous financial and in-kind investments to anchor maintenance on USFS lands. Utah continues to promote the well-being and safety of its rock-climbing community.

It is for these reasons that the State of Utah ("State") strongly opposes the USFS's proposal to classify fixed anchors as "installations" under section 4(c) Wilderness Act of 1964 (16 U.S.C. 1133(c)). The State requests that such language be removed from the final version of Forest

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Service Manual Section 2355-Climbing Opportunities. Fixed anchors such as bolts or pitons are generally small, unobtrusive, and blend in with the surrounding landscape. They do not detract from wilderness character. Modern technology, such as electric drills, now allows for the motorized installation of fixed anchors to occur with minimal (if any) noise pollution. Fixed anchors have long played a central role in the recreational activities that occur in Utah's USFS wilderness areas, and these anchors have enhanced the quiet, non-motorized quality of Utah's wilderness areas.


As fixed anchors (some of which have existed since the 1960s) become older and worn out, replacing these anchors is essential for the safety of Utah's climbing community. The work of fixing old and worn-out anchors is almost always done by community organizations such as the Salt Lake Climbers Alliance. Old, worn-out anchors can fail when holding a climber's body weight, leading to potentially fatal situations. To promote public safety in designated wilderness areas, the USFS's proposed FSM 2355 should seek to enhance the ability of community organizations to replace old anchors rather than make the process more burdensome. FSM 2355 should not require a Minimum Requirements Analysis (MRA) for the placement or maintenance of fixed anchors, which will likely lead to long delays for fixed anchor installation and increase the risk of accidents occurring when old anchors are used. The offices of the USFS's ranger districts are already understaffed and overworked and lack the resources to process MRAs in a timely manner. The proposed MRA requirements if enacted, will ultimately lead to the prolonged use of old, unsafe fixed anchors and more dangerous accidents within USFS wilderness areas. These unnecessary barriers, as proposed, should not be the policy objective of the USFS.

The State also opposes the USFS's proposal to require climbing management plans to be completed before permitting any future fixed anchors. Completing a climbing management plan is costly and time-consuming and requiring such plans for under-resourced USFS personnel will likely lead to even more delays in the necessary replacement of aging fixed anchors.

The USFS can already protect natural resources through the regulation of fixed anchors. New USFS directives should seek to empower district rangers with greater flexibility to make site-specific solutions. Close coordination with local governments and local rock-climbing communities is the best way to strike the right balance between protecting rock climbers' safety and natural resources. Utah's rock-climbing community cares deeply about the stewardship of the lands where they recreate, and partnership with local communities will enhance the character of wilderness character far more than imposing cumbersome paperwork requirements on USFS staff.

The State appreciates the partnership between the USFS, the State of Utah, and our recreational communities, and we look forward to working with the USFS to find locally led ways to improve rock climbing opportunities on our public lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Johnson', with a long horizontal flourish extending to the right.

Redge Johnson  
Director